



**POLICY ON
PRESERVATION OF DOCUMENTS
OF
PNB HOUSING FINANCE LIMITED**

Table of Contents

S. No	Particulars	Page No
I.	Preamble	3
II.	Scope	3
III.	Record Maintenance	3
IV.	Roles and Responsibilities	3
V.	Preservation of Records	3
VI.	Destruction of Records	4
VII.	General	4
VIII.	Review and Amendment	4
IX.	Disclosure on Website	4
X.	Annexure 1	5
XI.	Annexure 2	6
XII.	Annexure 3	7

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POLICY ON PRESERVATION OF DOCUMENTS

(Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

I. PREAMBLE

This Policy for Preservation of Documents (the “**Policy**”) has been formulated by PNB Housing Finance Limited (the “**Company**”) and approved by its Board of Directors (the “**Board**”) in compliance with the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR**”) which mandates the preservation of documents by a listed company.

II. SCOPE

The Policy extends to preservation of documents and also their safe disposal or destruction by the Company. It ensures that all the necessary documents and records of the Company are adequately protected and preserved in accordance with the statutory requirements and that the records of the Company which are no longer required or are of no use, are discarded after following the due process for their discarding.

This Policy shall apply to all ‘Records’ which refers to all final and executed documents, agreements/ contracts, writings, papers, communications, judgments, orders, approvals, licenses, registrations, emails and attachments, documents scanned into PDF format, power point presentations, spreadsheets, databases, picture and graphic files, computer generated images, faxes, network access files and internet usage files and/or such other documents as may be prescribed by the Company from time to time, including any physical or electronic copies thereof, created or received by the Company (“**Records**”).

III. RECORD MAINTENANCE

Records have been divided into the following categories:

- (i) Records of a permanent nature (as per Annexure 1) subject to the modifications, amendments, additions, deletions, or any changes made therein from time to time.
- (ii) Records to be maintained and preserved for a term of not less than eight years after completion of the relevant transactions (as per Annexure 2) subject to the modifications, amendments, additions, deletions, or any changes made therein from time to time.

IV. ROLES AND RESPONSIBILITIES

In terms of this Policy, the respective Functional Heads of the Company shall be responsible for maintenance, preservation and destroying of Records in respect of the areas of operation falling under their purview. No employee shall destroy any record without the prior approval of the respective Functional Head.

V. PRESERVATION OF RECORD

- (i) Documents specified in Annexure 1 shall be maintained and preserved indefinitely.
- (ii) Documents specified in Annexure 2 shall be maintained and preserved for a minimum of eight years.
- (iii) Documents specified in Annexure 3 shall be maintained and preserved for a minimum of ten years or as per the extant legal requirements, applicable whichever is later:
 - a. From the date of last transaction on the respective records, or
 - b. From the date of expiry of the policy
- (iv) As per RBI KYC Master Directions, 2016, preservation and reporting of customer information, with reference to provisions of PML Act and Rules, Company shall maintain all necessary records of transactions between the Company and the customer, both domestic and international, for at least five years from the date of transaction. Further, Company shall preserve the records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship, for at least five years after the business relationship is ended;

- (v) As per RBI- Master Directions, outsourcing agreement should provide for the preservation of documents and data by the service provider in accordance with the legal/ regulatory requirements.
- (vi) All other Records not mentioned above shall be preserved by the Company for such time periods as may be specified under the applicable laws or in accordance with commercial/business requirements of the Company, whichever is longer;
- (vii) Notwithstanding anything to the contrary in this Policy, all Records shall under no circumstances whatsoever be maintained for a period less than the periods specified under the applicable laws;
- (viii) In accordance with LODR, all disclosures made by the Company to the stock exchanges shall be hosted on the website of the Company for a minimum period of five years from the date of such disclosure and thereafter as per the archival policy of the Company;
- (ix) The Company may maintain Records either electronically or in physical form or in both forms as per its discretion and convenience. The Company shall ensure that physical preservation is in a proper store/record room, and electronic preservation is in proper media formats and stored in appropriate storage conditions, and accessible only by authorised personnel.

VI. DESTRUCTION OF RECORDS

After expiry of the respective preservation periods, the Records may be destroyed in such mode under any instructions approved by the respective Functional Heads. Destruction of Records as a normal administrative practice will also be followed for records which are duplicate/ unimportant/ irrelevant.

VII. GENERAL

Notwithstanding anything contained in this Policy, the Company shall from time to time ensure compliance with any additional requirements as may be prescribed under the laws/ regulations either existing or arising out of any amendment to such laws/ regulations or otherwise and applicable to the Company, including directions from any statutory/regulatory authorities, tribunals, direct and indirect tax authorities, Registrar of Companies, or court of law to preserve any Records for a period more than that prescribed herein.

VIII. REVIEW AND AMENDMENT

In case of any change in applicable laws which are not in consonance with this Policy, such amended/modified provisions of applicable law would prevail over the Policy.

This Policy will be reviewed by the Board annually or at earlier intervals as may be deemed necessary and if required, the Board may modify the same in order to comply with the statutory requirements and also to incorporate best industry practices.

Consequent upon any change in the SEBI LODR Regulations or any other applicable law/ regulatory guidelines, if any, such change to the extent applicable to the Company, shall be deemed to be a part of this Policy until this Policy is reviewed and approved.

IX. DISCLOSURE ON WEBSITE

This Policy and subsequent amendments thereto shall also be disclosed on the Company's website.

Records whose preservation shall be of permanent nature

S. No	Particulars	Type of Documents to be preserved
1	Corporate / Organizational	i. Incorporation documents; ii. Statutory licenses, registrations and permits; iii. Permanent Account Number card.
2	Share and Secretarial	i. Annual Reports; ii. Listing agreement with the Stock Exchange(s); iii. Prospectus; iv. Documents related to bonus issue, rights issue, stock split; v. Documents related to declaration of interim and final dividend; vi. General meeting minute book; vii. Board / Committee meeting minute books; viii. Resolutions passed by the Board/Committee in circulation and related documents; ix. Statutory registers; x. Company policies/charters/bye laws; xi. Secretarial audit report and the related documents; xii. Books and documents relating to issue of share certificate. xiii. Memorandum of Association and Articles of Association
3	Finance and Accounting	i. Audited financial statements and related documents; ii. Auditor's reports.
4	Legal	i. Property records (premises owned by the Company) ; ii. Documents related to the acquisition and sale of property (other than re-possessioned assets held for sale); iii. Records related to intellectual property including patent, trademark, copyright or trade secret; iv. Non-disclosure agreements; v. Contracts, agreements (unless specifically addressed elsewhere in this policy), deeds, licenses; vi. All documents related to past/ongoing litigations.
5	Miscellaneous	i. Deposit Register, in physical or electronic form, in terms of the regulatory provisions. ii. All other records which are required to be preserved indefinitely under other applicable laws, or as may be recommended by the Board from time to time. iii. Official files of present employees (Ongoing basis till in employment);

Records whose preservation shall be for at least eight years

S. No	Particulars	Type of Documents to be preserved
1	Directors/ Key Managerial Personnel/Senior Management	i. Consent to act as a Director, notice of disclosure of interests, Intimation of disqualification, if any; ii. Disclosures made under SEBI (Prohibition of Insider Trading) Regulation, 2015; iii. Resignation letters; iv. Service agreements/letter of appointment; v. Correspondences with the Directors.
2	Share and Secretarial	i. Investor grievance correspondences; ii. Correspondences with statutory authority(ies); iii. General meeting notices; iv. Documents relating to postal ballots; v. Board / Committee meeting notices; vi. Board / Committee meeting agenda papers; vii. Attendance Register; viii. Board presentations; ix. Certified extracts from the minute book; x. Forms (including e-forms), returns and documents including agreements, receipts, undertakings, affidavits with Registrar of Companies, Regional Director, Ministry of Corporate Affairs and/or any other statutory authority(ies); xi. Annual return and related documents; xii. Instrument creating a charge including modification and satisfaction thereof; xiii. Newspaper publications. xiv. Disclosure of all the material events and information to the stock exchange(s) in line with the provisions of LODR and such disclosures shall be hosted on the website of the Company for a period of five years, post which the same shall be moved to an archival folder on the website as per the policy on archival of Web Disclosures.
3	Finance and Accounting	i. Unaudited financial statements and related documents; ii. Books of accounts and vouchers; iii. Audit related documents; iv. Management letters; v. Investment statements; vi. Cost records, if applicable; vii. Bank statements; viii. Forex transactions; ix. Income tax/GST returns; x. Tax deduction records; xi. Records relating to GST; xii. Records relating to customs and excise, if applicable; xiii. Records relating to payment of gratuity; xiv. Details of related party transactions; xv. Underlying workings relating to the preparation of the financial statements
4	Employee related	i. Records relating to employees' provident fund; ii. Accounts and returns submitted to Regional Provident Fund Office; iii. Electronic Challan Receipts; iv. Official files of ex-employees; v. Payroll records
5	General	i. Insurance policies; ii. Documents relating to insurance claims, settled and pending; iii. Press releases; iv. Documents and agreements with media company, PR agency. v. Lease agreements, rent agreements; vi. Advises, opinions, valuations and other documents received from the Company's advisors and consultants; vii. Documents related to the acquisition and sale of re-possessed assets held for sale;
6	Miscellaneous	i. Any other documents which are required to be preserved for more than eight years under applicable laws (e.g., documents that are required to be maintained under Prevention of Money Laundering Act, and the Rules made thereunder).

Below records are required to be preserved for a minimum of 10 years In line with requirement under Insurance Regulatory and Development Authority of India (Maintenance of Information by the Regulated Entities and Sharing of Information by the Authority), Regulations 2025, IRDAI circular via IRDAI/Reg/4/211/2025

1. A record of all employees showing - (a) the name and address; (b) employee identification number; (c) date of appointment; (d) date of termination, if any; (e) present designation; (f) present salary, perks, allowances and any other benefits; (vii) taxes and related papers; (g) business expected from them and actual business written by them with cross-reference to appointment letter and date of termination, if any; (h) licence/registration number and licence/ registration validity period; (i) date of certificate of training completion, if required along with the date of passing the test; (j) dates of renewal training in case of employees qualified for solicitation of insurance business and (k) name of the branch or office where posted.
2. A record of grievances and complaints with details such as (a) policy number; (b) name of the insurer; (c) details of the insurance policy with cross reference to the person solicited the policy; (d) name of the complainant; (e) date of receipt of grievance; (f) category of grievance; (g) mode of receipt of grievance such as : telephone, website, letter or otherwise; (h) brief description of grievance; (i) date of acknowledgement of grievance; (j) date of resolution, if resolved by the insurance intermediary; (k) date of forwarding the complaint to insurer, if the same cannot be resolved by the insurance intermediary, and (l) date of resolution by the insurer. and keep the Authority informed about the number, nature and other particulars of the complaints received from such clients in format and manner as may be specified by the Authority
 - i. Original intermediary license or registration and renewal license or registration including the applications and other correspondence with the Authority;
 - ii. (a) Organization Charts; (b) Beneficial Owners; (c) Affiliates; (d) Group Companies, and (e) Subsidiaries as per applicable laws, Regulations and Guidelines;
 - iii. Standard Operating Manuals for all functions;
 - iv. Qualification and training certificates of persons qualified for solicitation of insurance business, and sales person-wise business details for each financial year;
 - v. Correspondence with other Government and Tax Authorities;
 - vi. List of all pending cases filed by and against the intermediary or insurance intermediary;
 - vii. A record of appointment letters issued to all employees and changes therein;
 - viii. Cash book and disbursement book with supporting documents;
 - ix. A record of all investments, other assets, loans and advances;
 - x. A record of all offices showing attendance, in any form, of staff indicating employees who attend the office each day;
 - xi. A record of commission or remuneration or rewards or any other amounts received under each transaction along with corresponding invoices and payment vouchers;
 - xii. A record of offices opened, closed or relocated along with all relevant documents and approvals;
 - xiii. A record of all phone numbers used for solicitation of insurance business along with the bills.

Above records, shall be maintained either for a minimum period of 10 years or as per the extant legal requirements, applicable-whichever is later:

- i. from the date of last transaction on the respective records, or
- ii. from the date of expiry of the policy.
