



**GRIHUM**  
HOUSING FINANCE

*Apna Ghar. Apni Pehchan.*

# Record Retention Policy

**Grihum Housing Finance Limited**

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Registered Office: 6<sup>th</sup> Floor, B-Building, Ganga Trueno, Lohegaon, Pune – 411014

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**Purpose:** The purpose of this Policy is to establish a structured framework for retaining and purging the Company's records in compliance with applicable laws, thereby streamlining record management and ensuring the smooth and efficient functioning of Grihum Housing Finance Limited.

**Document Control:**

Policy Name:	Record Retention Policy
Code of Policy:	Grihum/Secretarial/Record Retention/5.0
Original Issue Date:	28.10.2015
Effective Date:	22.10.2024
Policy Owner Department:	Secretarial
Recommendation Committee:	Risk Management Committee
Approved:	Board of Directors
Last Approval Date:	22.10.2024
Last Reviewed Date:	05.11.2025
Latest Version No:	5.0
Governing Guidelines of the Policy	Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any amendment thereto ("Listing Regulations")
Functional aspect checked by	Chief Compliance Officer & Functional Heads
Reviewed by:	Chief Financial Officer
External vetting, if any:	Vinod Kothari & Co.
Classification:	Internal / <del>External</del> / Public

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## Record Retention Policy

### 1. Introduction & Objective

Record retention is a complex subject as there is no one place where all records can be found, they are scattered as per the requirements of different legislation and applicable laws to the Company.

Document retention means the manner of retaining the documents of Grihum Housing Finance Limited (hereinafter referred as “the Company”) and the time period up to certain documents are to be retained by the Company and the time period when such documents can be allowed to be purged.

The Record Retention Policy aims at streamlining this and ensuring smooth functioning of the Company.

**Its core aspect is as follows:**

- a. Nature and types of documents to be preserved/archived and retrieved
- b. Duration and circumstances under which they must be preserved
- c. Security and confidentiality of these records/documents
- d. Mode of destruction including but not limited to electronic and physical.

### 2. Legal Requirements

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- a) documents whose preservation shall be permanent in nature;
- b) documents with a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

Further Regulation 51(3) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 51 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

In addition to the above, Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 read with the Master Direction – Know Your Customer (KYC) Direction, 2016 as issued by the Reserve Bank of India (“RBI”) and as amended from time to time specifies that the Company shall maintain, preserve and report customer account information, with reference to provisions of Prevention of Money Laundering Act and its rules.

Section 44AA of the Income Tax Act specifies that books of account and other specified documents shall be kept and maintained for a period of 6 years from the end of the relevant assessment year, i.e., for a total period of 7 previous years. Therefore, as per Income Tax Act requirement, the records shall be maintained for the period of 7 years.

Further, the Goods and Services Act read with rules thereunder states that every registered person shall keep and maintain books of account or other records until expiry of 6 years from the due date of furnishing of annual return for the year pertaining to such accounts and records. If there is any appeal, show cause or any other litigation then we are required to maintain such details till the issue is resolved.

Recently, there is an order of the Hon'ble Supreme Court on account of the covid-19 pandemic, all statutory deadlines starting from 15.03.2020 till 28.02.2022 were excluded for the purpose of limitation. Accordingly, the period of book keeping will increase by nearly 2 years.

The Company had adopted a Policy on preservation and archiving of the Documents prepared in line with the requirements of Listing Regulations. In order to standardise record retention process across function, this policy replaced the policy on preservation of documents dated August 4, 2020 which was specifically applicable to Secretarial function. The same is further modified and adopted in this version for streamlining of the same with compliance and regulatory requirements.

One of the pre-requisites of good records management is to ensure that records are neither prematurely destroyed nor kept for periods longer than required – at the cost of economy and efficiency. This policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013, RBI, National Housing Bank (“NHB”) and other regulators (under whose gamut all the functions of the Company are subjected to). The record retention policy requires to provide for the systematic retention and destruction of documents received or created or modified by the Company. This policy addresses all documents regardless of physical or electronic form, and this policy helps understand how long each type of document should be kept.

### **3. Definitions**

- 3.1. “Applicable Law” includes any statute, law, listing regulations, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, policy, requirement, notifications and clarifications or other governmental instructions and/or mandatory standards as may be applicable to the Company from time to time.
- 3.2. “Board” means the Board of Directors of the Company or its Committee.

**3.3. “Company” means Grihum Housing Finance Limited**

- 3.4. “Current Document(s)” means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- 3.5. “Document(s)” includes but not limited to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Applicable Law or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- 3.6. “Electronic Record(s)” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- 3.7. “Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- 3.8. “Maintenance” means keeping Documents, either physically or in Electronic Form.
- 3.9. “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.
- 3.10. “Records” means documentary evidence of past events or transactions.
- 3.11. “Authorized Person” means a senior personnel so designated from each respective functions/ departments.

The words and phrases used in this policy and not defined here shall derive their meaning from the Applicable Law.

**4. Applicability**

This Policy is extended to all business segment functions and departments of the Company. The policy will apply to all employees of the Company and it covers all the records/documents issued/held by the Company. The roles and responsibilities of the Company’s employees, scope of activities, scope of operations and the monitoring mechanism of record retention shall be covered in Standard Operating Procedure (SOP) of respective functions/ departments.

**5. Guidelines for Record Maintenance**

**5.1. Classification of documents**

The preservation of documents of the Company, as approved by the Board of Directors of the Company, should be as per the following classification:

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions
- The following overriding matters may be taken into account while setting retention periods. The onus is on the management to ensure that the requirements of (a), (b), and (c) are adequately met:
  - a) Compliance with statutory and regulatory requirements;
  - b) Satisfaction of the needs of regulatory inspectors to have access to certain records; and
  - c) Satisfaction of the needs of internal and external auditors to have access to certain records.

The indicative list for class of documents and the time period for which it is required to be maintained is provided in **Annexure A**.

#### 5.2. Modes of Preservation

- The documents may be preserved in physical or electronic form. Insofar as practical and possible, after taking into consideration the legislative and regulatory requirement, the documents shall be preserved in electronic form.
- The Functional Heads of the Company or delegate(s) one level below the Functional Head required to preserve the documents shall be the Authorised Person (defined herein) for that Function/Department who is generally expected to observe the compliance of preservation of Documents as per the requirements of Applicable law.
- The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorized Person from each respective functions/departments, so as to ensure integrity of the documents and prohibit unauthorized access.

#### 5.3. Custody of Documents

- Subject to the Applicable Law, the custody of the documents shall be with the Authorised Person. Where an Authorised Person tenders resignation, such person shall hand over all the relevant documents, lock and key, access control or password, or CD ROMs/USB storage drives/pen drive/hard disk/one drive data, other storage devices or such other documents and devices in his possession under the Policy.
- Functional Heads and/or one level below the Functional Head, shall be responsible for ensuring compliance of this Policy, as related to records in their possession, custody or control.

#### 5.4. Maintenance and preservation of records<sup>1</sup>

The following steps shall be taken regarding maintenance, preservation and reporting of customer account information:

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<sup>1</sup> The requirement of ten years is as per the NHB and IRDAI regulations. Eight years for record retention is as per Companies Act, 2013 and Income Tax Act. The RBI KYC Direction dated February 25, 2016 specifies a period of five years from the date of transaction for retention of records.



- a) Maintain all necessary records of transactions (domestic and international, if applicable) between the Company and the customer for a minimum of ten years from the date of transaction. Records specific retention periods will be defined in business/department level SOPs.
- b) 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, and for at least eight years after the business relationship is ended;
- c) Make available the identification records and transaction data to the competent authorities upon request;
- d) Maintain a system of maintaining proper record of transactions as prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005 ("PML Rules) and the amendments thereto.
- e) Maintain all necessary information in respect of transactions prescribed under Rule 3 of PML Rules so as to permit reconstruction of individual transaction, including the following:
  - The nature of the transactions;
  - The amount of the transaction and the currency in which it was denominated;
  - The date on which the transaction was conducted; and
  - The parties to the transaction.
- f) Evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities;
- g) Maintain records of the identity and address of their customer, and records in respect of transactions referred to in Rule 3 of PML Rules in hard or soft format.
- h) If the Company intends to maintain records in offshore locations, it will seek prior approval of the RBI.
- i) The Company shall maintain information in respect of transactions with its client in hard and/or soft copies.
- j) The Company shall ensure that records pertaining to the identification of customers and agents and their addresses (e.g. copies of documents like passports, identity cards, driving licences, PAN Card, utility bills etc.) obtained while opening the account and during the course of business relationship are properly preserved for at least eleven years after the business relationship is ended. Unless there is any litigation instituted or any threatened litigation, by or against the Company with respect to any customer, the documents/ records referred herein shall be stored only in electronic form.
- k) The Company shall ensure that records relating to all complex and all unusual large transactions and all unusual pattern of transactions which have no apparent economic or visible lawful purpose are preserved for eleven years.

#### 5.5. Place of storage

- The Company shall identify and have an approved place of storage to maintain all records safely.
- The selected location must be secure and fire proof.



- A well-defined reference/inventory of all documents archived with information on its physical/electronic location should be maintained.
- The Company may outsource its document storage activity, however this must be done after carrying out due diligence and verification. Further the Company shall enter into arrangements with the outsourced vendors/agencies after entering into an appropriate agreements and in compliance with the applicable RBI regulations pertaining to outsourcing of activities and the Company's internal Policy on Outsourcing.

#### 5.6. Retrieval of documents

At the time of retrieval of a document or sets of documents, the Company shall ensure the following:

- Define an approval and authority matrix to ensure that only legitimate requests for records retrieval are made.
- Define a time frame within which the documents will be ready for pick-up or delivery.
- For physical documents, ensure that the time frame communicated includes the time involved in identifying the location of the archived document and the time to physically retrieve the document from the location where it is stored.
- For electronic documents, ensure that there is no loss or damage at the time of transmission of information.

#### 5.7. Digitisation of Physical Records

The guidelines for determining retention period for electronic records shall be the same as that for physical records. If hard copies are required in order to comply with litigation etc. electronic copies too shall be kept. The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space. Physical records may be digitised as per following category:

- i. Physical records to be preserved permanently;
- ii. Records of secondary importance and have a reference value for a limited period – 10 years or such other period as may be applicable.

Physical Documents once digitised, may be destroyed, provided, record keeping of those documents are not mandated by law. Further document owner to take ownership of the proper digitisation of physical records, when physical records are converted into electronic form. Digitisation of Physical record and destruction of such physical record will be done as per this Policy.

#### 5.8. Destruction of documents

- The Company will have in place appropriate controls over the destruction of records upon expiry of the period set out in the policy statement. Such controls will include:
  - Authorisation and approval prior to destruction.
  - Establish procedures for destruction of physical documents/records (whether in-house or outsourced).
  - Maintenance of records in electronic media as per the Company's Information and Cyber Security policy.

- A register giving details of the documents in paper/electronic/other form destroyed, the date and means of destruction; the format of the register has to be in accordance with **Annexure D**.
- Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both physical and electronic documents.
- Temporary documents, excluding the documents in current use shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the documents are stored, after the prior approval of the Board or any other authority, if specifically required under the applicable laws/regulations pursuant to which the documents have been preserved. *(Refer Annexure C for the categories of documents which may be destroyed as a normal administrative practice)*
- The entries in the digital register shall be authenticated by the Authorised Person.
- The documents may be destroyed as follows:
  - Recycle non-confidential paper records; or
  - Shred or otherwise render unreadable confidential paper records; or
  - Delete or destroy electronically stored data.

#### 5.9. Archiving of Documents which are hosted on the Company's website

Recognizing the need to ensure the preservation and availability of the documents of the Company after their required regulatory preservation period, for any legal, administrative, and historical purposes, the Company adopts the following archival mechanism in respect of documents which are hosted on the website of the Company:-

- All documents generated, disclosed or received by the Company, on its website, for the purpose of shareholder/any other security holder communication, are the properties of the Company and constitute archival material.
- Archival material of the Company shall not be destroyed without the approval of the Authorised Person.

Provided that nothing contained herein shall be deemed to lead to an exception in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

- Material so selected for preservation shall be sent to the Company archives.
- The Authorised Person will be responsible for deciding how long archival material is to be retained in and under the direct control of the officer concerned, if the law does not specify any time period. The period shall not be less than 3 years.
- With reference to the pretext, the Documents submitted to the stock exchange, to be hosted on the website for the purpose of compliance with disclosure norms shall also be archived.
  - Archiving of the Documents submitted to the stock exchange, in terms of the Listing Regulations, shall be done after the lapse of the preservation period of 5 years as specified in Regulation 51(3).
  - For the Documents to be submitted to the stock exchange to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the specified/required time period.

#### 5.10. Record keeping for IT related applications

- The Record Retention policy shall be in line with other policies covering operations of the Company. Particularly, in case of record keeping in the electronic form, the record maintenance policy may be in line with the general Information Technology and Information System Security best practices.
- Digital records (soft copies) shall be categorized basis its importance and prioritization, aligning to the Organisation, Regulatory, Statutory and Legal requirements.
- Retention of the records need to be maintained in a secure IT environment with access to only restricted and authorized personnel.
- During retention, appropriate IT security controls are to be implemented to ensure protection against unauthorized access, data pilferage or record corruption.
- Backup should be taken for important records, as a fallback option, if required.
- Disposal of records should be done in a safe and secure manner, once the validity of retention period is over as per policy.

#### 5.11. Review of maintenance of records

Maintenance of records may be reviewed for adequacy against the following criteria:

- Content - what data is retained
- Frequency - intervals between updates
- Security - protection from unauthorised access
- Durability - safekeeping/protection from deterioration
- Accessibility - ready availability to authorised individuals
- Lag - delay between initiating and recording
- Accuracy - reliability and freedom from error
- Verification - ability to check accuracy.

#### 5.12. Authenticity

Where a document is being maintained both in physical form and in Electronic form, the authenticity with reference to the original physical form should be considered for every purpose.

#### 5.13. Interpretation

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this Policy is changed to conform to the law, rule, Regulation or standard.

### 6. Policy Review & Updates

The policy shall be reviewed by the Risk Management Committee and the Board as and when required for incorporating regulatory updates and changes, if any.

## 7. Change Control Record

Version No.	Change Request by	Memorandum of Change	Approval Date
1.0	Secretarial Team	New Policy adopted	28.10.2015
2.0	Secretarial Team	Review of Policy	04.08.2020
3.0	Secretarial Team	Review of Policy	24.05.2021
-	Secretarial	Name of the Company changed to Poonawalla Housing Finance Limited w.e.f. 22.07.2021	-
4.0	Secretarial	Annual Review	19.10.2022
-	Secretarial	Name of the Company changed to Grihum Housing Finance Limited w.e.f. 17.11.2023	-
5.0	Secretarial	To align with Regulatory Requirements	22.10.2024

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## 8. Annexures

### Annexure A - Indicative list

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
<b>I. Companies Act, 2013</b>	
<ul style="list-style-type: none"> <li>The memorandum and articles of the company</li> <li>Affidavit from the subscribers to the memorandum and from persons named as the first directors</li> <li>Register of members</li> <li>Books and Documents relating to the issue of share certificates, including the blank forms of share certificates</li> <li>Annual return</li> <li>The foreign register of members</li> <li>Minutes book of Board meetings, Committee meeting and general meeting</li> <li>Register of Charges</li> <li>Register of loans, guarantee, security and acquisition made by the company</li> <li>Register of investments not held in its own name by the company</li> <li>Register of contracts with related party and contracts and Bodies etc. in which directors are interested</li> </ul>	<ul style="list-style-type: none"> <li>The instrument creating a charge or modification (8 years)</li> <li>Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)</li> <li>Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)</li> <li>Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)</li> <li>All notices pertaining to disclosure of interest of directors (8 years from the end of the financial year to which it relates)</li> <li>All certificates surrendered to a company (3 years from date of surrender)</li> <li>Register of Directors and Key Managerial Personnel</li> <li>Register of ESOP</li> </ul>
<b>II. Secretarial Standard</b>	
<ul style="list-style-type: none"> <li>Minutes of Board and Committee meetings (SS-1)</li> </ul>	<ul style="list-style-type: none"> <li>Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)</li> </ul>
	<ul style="list-style-type: none"> <li>Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 10 years or as long as they remain current.</li> </ul>
<b>III. SEBI</b>	
<ul style="list-style-type: none"> <li>Application for issuance and listing of securities</li> </ul>	<ul style="list-style-type: none"> <li>All event-based disclosures</li> <li>Quarterly, Half Yearly and Annual Reports filed with Stock Exchange</li> <li>All stock exchanges intimation of Board Meeting or material disclosures; to be kept for period of 8 years or as defined under the Listing Regulations, as amended.</li> </ul>
<b>IV. Taxation</b>	
<ul style="list-style-type: none"> <li>Income tax returns and filings</li> <li>Tax Exemption and Related documents</li> <li>PAN, TAN, GST certificates</li> </ul>	<ul style="list-style-type: none"> <li>Excise/Customs/GST Records</li> <li>Tax Deducted at Source Records</li> <li>Income Tax papers/records</li> <li>Service Tax papers/records</li> <li>VAT / CST / State Sales Tax</li> <li>Customer and Vendor data records</li> </ul>

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
	<ul style="list-style-type: none"> <li>Copy of Output and Input invoices</li> <li>Accounting records based on which Income Tax/GST/Service Tax returns are filed and Tax Audit/GST Audit are being conducted</li> </ul>
	<p>Above records needs to be maintained for 7 years from the end of the Financial Year or completion of assessment under the applicable law whichever is later.</p> <p>In case any appeal for the year is pending then these records must be kept for one year post the completion of the appeal.</p> <p>*The Corana period i.e 15.03.20 to 28.02.22 shall be excluded from calculating the above limitation period</p>
<b>V. Legal</b>	
<ul style="list-style-type: none"> <li>Court Orders</li> <li>Patents, trademark registrations, copyright registrations</li> <li>Business / JV/ SPA /Loan/Lease Agreements</li> <li>Legal Opinions</li> </ul>	<ul style="list-style-type: none"> <li>Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation), unless the matter is under litigation.</li> <li>Miscellaneous – Legal Memoranda subject matter files (3 years after the close of the matter)</li> <li>Miscellaneous – Litigation files</li> </ul>
<b>VI. Customer Service</b>	
	<ul style="list-style-type: none"> <li>Call recording of customer's calls received at Call Centre for a period of 10 years</li> <li>Electronic data of customer interactions for a period of 10 years</li> </ul>
<b>VII. Regulatory Compliance (RBI)</b>	
<ul style="list-style-type: none"> <li>Certificate issued by RBI</li> <li>Form FC – GPR, FC – TRS, ARF etc.</li> </ul>	<ul style="list-style-type: none"> <li>Returns filed with RBI (11 years from date of filing with the RBI)</li> </ul>
<b>VIII. HR</b>	
<ul style="list-style-type: none"> <li>Salary Register/Payroll Registers</li> <li>Bonus &amp; Gratuity Records</li> <li>Statutory Registers and other Statutory Records</li> </ul>	<ul style="list-style-type: none"> <li>Statutory Returns / Challans – PF, ESI, P. Tax Etc. – Duration 12 Years.</li> <li>Employee File – Joining Docs, KYCs, Appointment Letter, Increment / Promotion Letters – Duration 7 Years.</li> <li>Disciplinary Action Proceeding – Domestic Enquiry etc. – Duration 7 Years.</li> </ul>
<b>IX. Accounts &amp; Finance</b>	
<ul style="list-style-type: none"> <li>Audit reports</li> </ul>	<ul style="list-style-type: none"> <li>Books of accounts including vouchers and bills (12 years)</li> <li>Bank Statements and Reconciliations (12 years)</li> <li>Payroll compliance related challans such as PF. ESI. P. Tax (12 years)</li> </ul>
<b>X. Business/Ops</b>	
	<ul style="list-style-type: none"> <li>KYC records of customers for a period of 5 years</li> <li>Customer loan files &amp; documents for a period of 10 years</li> </ul>
<b>XI. Administration &amp; Corporate Communication</b>	
<ul style="list-style-type: none"> <li>Original Purchase and Sale Agreement</li> <li>Property Card, Index II, Ownership records issued by Government Authority</li> <li>Property Insurance</li> </ul>	<ul style="list-style-type: none"> <li>All PO and Bills of payment (As per taxation requirement)</li> <li>Licenses/permissions issued by Government Authority (As per taxation requirement)</li> </ul>



**Annexure B: List of regulations and Acts considered**

Sr. No	Name of legislations/circulars
1.	Anti-Money Laundering /Counter Financing of Terrorism (AML/CFT)-Guidelines for General Insurers dated February 08, 2013
2.	Central Goods and Service Tax Act 2017
3.	Code on Social Security, 2020
4.	Companies Act, 2013 read with rules made thereunder
5.	Competition Act, 2002
6.	Contract Labour (Regulation and Abolition) Act, 1970
7.	Environment (Protection) Act, 1986 and E-Waste (Management) Rules, 2016
8.	Income Tax Act, 1961 and Income Tax Rules, 1962
9.	Indian Stamp Act, 1899, Amendment and Rules made thereunder
10.	Information Technology Act, 2000 and Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011
11.	IRDAI (Registration of Corporate Agents) Regulations, 2015
12.	Master Direction – External Commercial Borrowings, Trade Credits and Structured Obligations
13.	Master Direction – Information Technology Framework for the NBFC Sector dated June 08, 2017
14.	Master Direction – Know Your Customer (KYC) Direction, 2016 dated February 25, 2016
15.	Master Direction – Monitoring of Frauds in NBFCs (Reserve Bank) Directions, 2016
16.	Master Direction – Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016
17.	Master Circular- Returns to be submitted by Housing Finance Companies (HFCs) dated December 31, 2021
18.	Master Direction - Non-Banking Financial Company – Housing Finance Company (Reserve Bank) Directions, 2021
19.	Minimum Wages Act, 1948
20.	Motor Vehicles Act, 1988 and Central Motor Vehicles Rules, 1989
21.	Other Directions / Guidelines issued by RBI /IRDAI, as may be applicable on the Company from time to time
22.	Payment of Bonus Act, 1965 and Payment of Bonus Rules, 1975
23.	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
24.	Securities And Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015
25.	Selection, Installation And Maintenance Of First-Aid Fire Extinguishers - Code Of Practice (Fourth Revision)
26.	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013

## Grihum Housing Finance Limited

CIN: U65922PN2004PLC208751 | ☎ 020 - 67815500 | ✉ Info@grihumhousing.com

Registered Office: 6<sup>th</sup> Floor, B-Building, Ganga Trueno, Lohegaon, Pune – 411014



#### **Annexure C: Categories of documents which may be destroyed as a normal administrative practice**

The following categories of documents may be destroyed as normal administrative practice (indicative):

- Catalogues
- Copies of press cuttings, press statements or publicity material
- Letters of appreciation or sympathy
- Requests for copies of maps, plans, charts, advertising material (subject to clause on destruction of documents)
- Facsimiles where a photocopy has been made
- Telephone messages
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to clause on destruction of documents)
- Routine statistical and progress reports compiled and duplicated in other reports (subject to clause on destruction of documents)

#### **Annexure D: Format of the digital register of Documents disposed/destroyed**

Particulars Of Document Alongwith Provision Of Applicable Law	Date And Mode Of Destruction	Initials Of The Authorised Person