



ARYAMAN

FINANCE (INDIA) LIMITED

POLICY FOR MAINTENANCE AND PRESERVATION OF RECORDS

Author of the Policy	Ms. Anjali Gorsia Whole Time Director
Approved by	Board of Directors
Reviewed by the Board on	December 29, 2025
Name of the entity	Aryaman Finance (India) Limited

1. INTRODUCTION

Aryaman Finance (India) Limited (“AFIL” or “the Company”) has formulated this Policy for Maintenance and Preservation of Records (“the Policy”) in compliance with Section 12 of Prevention of Money-Laundering Act, 2002 (“PMLA”), Rule 3 of the PMLA (Maintenance of Records) Amendment Rules, 2005 and Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025 which mandates the Board of Directors for record maintenance and preservation.

In connection with the same, the policy for maintenance and preservation of records has been formulated for a structured framework for the systematic maintenance, retention, and disposal of records, ensuring compliance with regulatory requirements and best corporate governance practices.

2. PURPOSE:

This policy is designed to facilitate the systematic identification, categorization, maintenance, review, retention, and destruction of documents received or created in the course of business. The policy provides guidelines on how to identify documents that require maintenance, the duration for which certain documents should be retained, the procedures for disposing of those documents when they are no longer needed, and the methods for accessing and retrieving them when necessary.

We will preserve the records and documents for a minimum period as required under the respective regulatory provisions. We shall ensure compliance with the record-keeping requirements contained under PMLA as well as other relevant legislation, Rules, Regulations, and Circulars.

3. APPLICABILITY AND MODES OF PRESERVATION:

This Policy applies to all documents maintained in physical and electronic modes by us. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction, or anything that endangers the content, authenticity, utility, or accessibility of the documents. The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines, and regulations as applicable under which those documents are maintained. For preservation, documents that are required to be preserved permanently and that are required to be preserved for at least 5 years after completion of the relevant transaction are listed in Annexure A, and are subject to the modification, amendments, additions, deletions, or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, and deletions in the documents shall also be preserved for a term not less than 5 years by the company.

4. ROLES & RESPONSIBILITIES:

The respective Functional / Departmental heads of our organization shall be responsible for the maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of the Policy.

5. AUTHENTICITY:

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

6. REVIEW OF POLICY:

Notwithstanding anything contained in this policy, we shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations, either existing or arising out of any amendment to such laws/regulations or otherwise, and applicable to us from time to time. This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws about maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Board of Directors.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff/Employees/ and Directors of the Company.

Annexure - A:

This list is illustrative; additional items may apply. Please refer to the relevant regulations for complete details.

Records as per the Companies Act		
Sr. No.	Record Type	Preservation Period
1.	Memorandum and Articles of Association	Permanent
2.	Certificate of Incorporation	Permanent
3.	Minutes of Board and Committee Meetings Permanent	Permanent
4.	Minutes of Shareholders' Meetings	Permanent
5.	Register and Index of Members	Permanent
6.	Resolutions passed by circulation	8 Financial Years
7.	Listing Agreement executed with the stock exchanges	Permanent
8.	Attendance Register - Board and Committee Meetings	8 Financial Years
9.	Attendance Slip of General Meetings	8 Financial Years
10.	Register of Proxies	8 Financial Years
11.	Register of investments in securities not held in the name of the Company	Permanent
12.	Register of renewed and duplicate certificates	Permanent
13.	Register of contracts in which Directors are interested	Permanent
14.	Register of Members	Permanent
15.	Register of Charges	Permanent
16.	Register of Directors, Managing Director, Manager, and Secretary	Permanent
17.	Register of Directors' Shareholding	Permanent
18.	Register of Inter-corporate loans and investments	Permanent
19.	Register of transfer of shares	Permanent
20.	Register of Transmission of Shares	Permanent
21.	Forms filed with Registrar of Companies (ROC)	Permanent
22.	Register of Deposits	8 Financial Years
23.	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
24.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
25.	Annual Returns	8 Financial Years
26.	Correspondence with shareholders	8 Financial Years
Accounts and Finance Records		
Sr. No.	Record Type	Preservation Period
1.	Annual Audited and Financial Statements	Permanent
2.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3.	Investment Records	Financial Years from the date of redemption
4.	Engagement letters from Auditors	8 Financial Years
Tax Records		
Sr. No.	Record Type	Preservation Period
1.	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return.	8 Financial Years

2.	Documents, Challans, and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 Financial Years
Records as Per PMLA Act		
	<p>Maintaining proper records:</p> <ul style="list-style-type: none"> a) all cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency. b) all series of cash transactions integrally connected to each other, which have been individually valued below Rupees Ten Lakh or its equivalent in foreign currency, where such series of transactions have taken place within a month, and the monthly aggregate exceeds an amount of Ten Lakh rupees or its equivalent in foreign currency. all transactions involving receipts by non-profit organizations of value more than rupees ten lakh, or its equivalent in foreign currency; c) all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine, or where any forgery of a valuable security or a document has taken place, facilitating the transactions. d) all suspicious transactions, whether or not made in cash and by way of as mentioned in the PMLA Rules. e) all cross-border wire transfers of the value of more than five lakh rupees or its equivalent in foreign currency, where either the origin or destination of the fund is in India f) all purchase and sale by any person of immovable property valued at fifty lakh rupees or more that is registered by the reporting entity, as the case may be. 	
	<p>The company shall retain the following information for the accounts of its customers in order to maintain a satisfactory audit trail:</p> <ul style="list-style-type: none"> a) the beneficial owner of the account; b) the volume of the funds flowing through the account; and c) for selected transactions: d) the origin of the funds; e) the form in which the funds were offered or withdrawn, e.g., cash, cheques, etc.; f) the identity of the person undertaking the transaction; g) the destination of the funds; the form of instruction and authority. 	