

RADIANT FINANCIAL SERVICES LTD.

CIN : L65991WB1991PLC053192

Regd. Office : P-355, KEYATALA ROAD, KOLKATA - 700 029

Phone : (033) 2464 3717, (033) 4064 8252, Fax : 91 33 2464 5665

Visit us at : www.radiantfinancialservices.com

E-mail : rfsl@rediffmail.com

POLICY ON PRESERVATION OF DOCUMENTS

1. Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of Radiant Financial Services Limited (the "Company") is obliged to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company effective 1 December, 2015.

2. Definitions

1. "Board"

Board means "Securities and Exchange Board of India."

2. "Company"

Company means "Radiant Financial Services Limited"

3. "Documents"

Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

4. "Listing Regulations"

Listing Regulations means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

3. Objective

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company.

4. General

Notwithstanding anything contained in this Policy, the Company shall ensure to comply 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 the Company, from time to time.

5. Amendment

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.



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RETENTION SCHEDULE

Sl. No	Record Category	Record Type	Minimum Retention Requirement
1	Board Meeting & Committee Meeting records	<ol style="list-style-type: none"> 1. Agenda 2. Internal Audit yearly Reports 3. Board Resolutions 4. Committee Resolutions 5. Board Minutes 6. Committee Minutes 7. Adopted Policies 8. Attendance Registers 9. Disclosure of Interest 10. Other Miscellaneous reports/ records 	Permanent
2	General Meeting records	<ol style="list-style-type: none"> 1. Register of members 2. Minutes 3. Attendance Register 	Permanent
3	Other Secretarial records	<ol style="list-style-type: none"> 1. Incorporation/ Conversion/ Business commencement Certificates. 2. Memorandum of Association & Articles of Association. 3. Common Seal 4. Annual Reports 5. Various Statutory Registers pursuant to the Companies Act, 1956 and/or Companies Act, 2013. 6. Share Transfer, transmission etc. correspondences with the Registrar & Share Transfer Agent. 7. Correspondences with MCA, ROC, RTA etc. 	Permanent
		<ol style="list-style-type: none"> 1. Correspondences with the Shareholders. 	8 years from the date the complaint is resolved
		<ol style="list-style-type: none"> 1. Copies of all annual returns along with certificates & documents required to be annexed thereto 	8 years from the date of filing with the Registrar.
4	Insurance Claims	<ol style="list-style-type: none"> 1. Insurance Policy Execution/ Renewal Certificate 2. Insurance Claims records 	8 years from lapse of the Policy/ Settlement of claim.
5	SEBI & Stock Exchange Records	<ol style="list-style-type: none"> 1. Correspondences with SEBI and CSE, etc 2. Quarterly/ Annual/ Non- Quarterly / others Compliances submitted from time to time. 3. Listing Agreement 4. Disclosure in Newspapers/ publications 	Permanent
6	RBI Records	<ol style="list-style-type: none"> 1. License Certificate/ Renewal Certificate 2. Statutory Returns/ Reports etc. submitted from time to time. 3. - Annual return to RBI 	Permanent
		<ol style="list-style-type: none"> 1. Correspondences with Statutory bodies. 2. Auditors Report 3. Disclosure in Newspapers, if any related to RBI 	8 financial years following the relevant Financial Year.



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		<p>1. Client Records & transactions pursuant to the 'Know Your Customer' (KYC) Guidelines - Anti Money Laundering Standards (AML) - 'Prevention of Money Laundering Act, 2002</p> <p>2. Records pertaining to the identification of the customers and their address (e.g. copies of documents like passports, identity cards, driving licenses. PAN card, utility bill for individuals and HUF and for Corporates MOA & AOA, Financial Statements, details of directors etc.) obtained while opening the account and during the course of business relationship including yearly updates and change in KYC records as and when required.</p> <p>3. Records pertaining to complex, unusual large transactions, which have no apparent economic or visible lawful purpose.</p>	10 years after completion of the relevant transactions.
7	Misc Licenses obtained from Statutory Authorities	<p>1. Trade License</p> <p>2. Shop and Establishment, etc.</p>	Permanent
8	Property Records	<p>1. Agreement/ Contracts</p> <p>2. Documents relating to acquisition and sale of Real Property.</p>	Permanent
9	Legal	Correspondences with Courts/ other statutory bodies regarding any petition / cases/ suit etc.	Permanent
10	Personal Records	1. Official Personnel Files of Active Employees and trainees	To be retained during active employment.
		2. Official personnel files of inactive employees and Trainees	8 years from the date of termination of employment
11	Finance	<p>1. Audited Financial Statements</p> <p>2. Auditors Reports</p>	Permanent
		1. Books of Accounts & Vouchers	8 financial years following the relevant Financial Year.
12	Taxation	<p>1. Registration/ amendment Certificate under various relevant provisions in force.</p> <p>2. Correspondences with the Statutory bodies</p>	Permanent
		1. Preservation of Specific books of accounts	8 financial years following the relevant Financial Year.
		1. Records pertaining to various other laws in force	Records maintained under various other laws in force from time to time would be acceptable.

