Magma General Insurance Limited
(Erstwhile Magma HDI General Insurance Company Limited)

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL

(Pursuant to Regulation 9 and Regulation 51 of SEBI (LODR) Regulations, 2015 and Companies Act, 2013)

Policy Title	Policy on preservation of Documents and Archival
Effective Date	30/04/2024
Policy Revision dates	NA
Approved by	Board of Directors
Code Owner	Company Secretary

Base Document	**:**	**Regulation 9 and Regulation 51 of SEBI (LODR) Regulations 2015 read with Company Act 2013 and its rules (including its amendments thereof)**
Initial Document Prepared by	**:**	**Ms. Sweta Bharucha**
Functional aspects checked by	**:**	**Ms. Sidhi Jatkar**
Legal aspects checked by	**:**	**Ms. Swarnima Agrawal**

Version Control Summary

Version No.	Change Request by	Memorandum of Change	Approval date
1.0	Company Secretary	New Policy	30.04.2024
-	Secretarial Team	No change	29.04.2025
-	Secretarial Team	No change	05.05.2026

1. PREFACE

Magma General Insurance Limited (Erstwhile Magma HDI General Insurance Company Limited) (the "Company") has always been committed to ensure safe keeping of the records and documents as a good corporate governance practice, for such minimum period as may be required under the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as "Listing Regulations"), and other applicable laws at the same time destroy the documents which are no longer required, to avoid extra inventory of documents.

Regulation 9 of the Listing Regulations, mandates that every listed entity shall formulate a policy on preservation, approved by the Board, of the documents / records maintained by the Company either in Physical Mode or Electronic Mode, classifying them into the following categories:

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

Further, Regulation 51 of the Listing Regulations also refers to an Archival Policy as per which all events or information, which have 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 the website.

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

Accordingly, the Company has framed this policy on preservation of Documents and Archival ("Policy") in pursuance of Regulation 9 and Regulation 51 of the Listing Regulations including but not limited to documents related to:

a. Companies Act 2013 read with Rules thereof;
b. SEBI Act read with respective SEBI Regulations;
c. Circulars, guidelines, notifications, etc relating to a. and b. above and amendments made thereof ("**Defined Laws**")

2. DEFINITIONS

"Act" means the Companies Act, 2013 and rules made thereunder;

"Applicable Law" means any law, rules, circulars, guidelines or standards issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA), Insurance Regulatory and Development Authority of India (IRDAI), the Institute of Company Secretaries of India (ICSI) and any other regulatory body or authority (including its amendments made thereof) in relation to preservation of

documents, to the extent applicable to an unlisted public company registered as an insurance company having listed its non-convertible debentures;

"**Authorised Person"** means Company Secretary appointed by Board of Directors from time to time, who shall be the Compliance Officer under the SEBI Laws duly authorized by the Board of the Company for the purpose of deciding the periodicity of preservation of the document and other decisions pertaining to archival thereof.

"Board" means the Board of Directors of the Company;

"Book and/or paper" means as defined in section 2(12) of the Act that includes books of account, deeds, vouchers, writings, documents, minutes and registers maintained on papers or in electronic form;

"Books of Account" means as defined in section 2(13) of the Act and includes records maintained in respect of –

(i) All sums of money received and expended by a company and matter in relation to which the receipt and expenditure take place;
(ii) All sales and purchases of goods and services by the company;
(iii) The assets and liabilities of the company; and
(iv) The items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section.

"Company" means Magma General Insurance Limited (Erstwhile Magma HDI General Insurance Company Limited)

"Document" means as defined in section 2(36) of the Act that includes summons, notices, requisitions, order, declaration, form and register, agreements and memorandum of understanding, papers, certificates, records, contracts, files, books, letters, tapes, CDs, DVDs, electronic storage devices, etc. whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

"Electronic Form" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device;

"**Financial statement"** means as defined in section 2(40) of the Act which includes—
i) A balance sheet as at the end of the financial year;
ii) A profit and loss account, or in case of a company carrying on any activity not for profit, an income and expenditure account for financial year;
iii) Cash flow statement for the financial year;
iv) A statement of changes in equity, if applicable;

v) Any explanatory note annexed to, or forming part of, any document referred to in sub-clause (i) to sub-clause (iv);

"Memorandum" as defined in section 2(56) of the Act, means the memorandum of association of a company as originally framed or as altered from time to time in pursuance of any previous company law or of this Act;

"Officer" as defined in section 2(59) of the Act includes any director, manager or key managerial personnel or any person in accordance with whose directions or instructions the Board of Directors or any one or more of the directors is or are accustomed to act;

"Prospectus" as defined in section 2(70) of the Act, means any document described or issued as prospectus and includes a red herring prospectus referred to in section 32 or shelf prospectus referred to in section 31 of the Act or any notice, circular, advertisement or other documents inviting offers from the public for the subscription or purchase of any securities of a body corporate;

"Preservation" means to keep documents in good order, either physical or in electronic form for future reference;

"Register of Companies" as defined in section 2(74) of the Act means register of companies maintained by the Registrar on paper or in electronic mode under the Act;

3. Role and Responsibility

The respective departmental/division head of the Company shall be responsible for maintenance and preservation of the documents in terms of this Policy.

Scope and Coverage

This Policy intends to provide guidance to its officers for maintenance of the documents and archival of all events or information which have been disclosed to the Stock Exchange(s) and hosted on the website of the Company in accordance with the Regulations including their preservation and disposal. For the purpose of preservation, the documents are classified into two broad categories—

Where there is a period for which a Document is required to preserve as per Applicable Law, for such period as may be prescribed. An indicative list of such documents is mentioned in:

a. Schedule "A" - Documents whose preservation shall be permanent in nature
b. Schedule "B" - Documents, whose preservation is required for a period of at least eight years after completion of the relevant transactions
c. Schedule "C" – Documents whose preservation is required for a period of at least three years after completion of relevant transactions.
d. Schedule "D" - Documents, whose preservation is required for a period of at least one year after completion of the relevant transaction

2. In case of any other Document, for such period, as the Authorised Person, in consultation with the head of the department/ division and Compliance Officer takes a considered view about its relevance.

Schedule "A"

Documents whose preservation shall be permanent in nature

Sr. No.	Description of Documents	Reference
1.	Memorandum & Articles of Association of the Company	Sec 4 & 5 and Sec 17
2.	Register of Members commencing from the date of registration of the company	Sec. 88
3.	Register of Members including Foreign Members	Sec 88
4.	Register of share transfer/transmission with Transfer deeds & documents	Sec 56
5.	Register of Charge & Mortgage	Sec 85
6.	Register of Loan, Investments & Guarantee	Sec 186(10)
7.	Register of Contracts/Arrangements in which the Directors are interested	Sec 189(4)
8.	Register of Directors & Key Managerial Personnel(s)	Sec 170 (1)
9.	Minutes Book of Board, Committee and Shareholder Meetings.	SS-1 (Para 8), Sec 118, SS-2 (Para 18) Sec 118
10.	Register of investments not held in its own name by the Company (MBP 3)	Sec 187(3)
11.	All other documents which are required to be maintained permanently in terms of aforesaid defined laws for this policy	

Schedule "B"

Documents, whose preservation is required for a period of at least eight years after completion of the relevant transactions.

S. No.	Description of Documents	Reference
1.	Books of Accounts	Sec 128
2.	Internal Audit Records	Sec 138
3.	Financial Statements	Sec 129
4.	Prospectus	Sec 31, 32
5.	Copies of Annual Return filed with ROC	Sec 92
6.	Forms & papers filed with Registrar of Companies and other regulatory authorities	Sec 117
7.	Notice along with agenda papers sent to Directors for Board and Committee meetings	Sec 173
8.	Statement under Grievance Redressal Mechanism	Reg. 13(3)

9.	Compliance certificate issued by RTA regarding share related activities	Reg. 7(3)
10.	Proof of payment Listing fees	Reg.7(5)
11.	Disclosure under Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by insiders	Reg. 10(1)
12.	Register of Debenture holders including Foreign Debenture holders	Sec 88
13.	Attendance Register	SS -1
14.	Register of satisfaction of charge	Sec 82
15.	All other Registers & Records under the Companies Act, 2013 which are required to be maintained up to maximum 8 years.	

Schedule "C"

Documents, whose preservation is required for a period of at least three years after completion of the relevant transaction.

S. No.	Description of Documents	Reference
1.	Proof of sending notice of the board meeting	SS-1
2.	Proof of sending agenda and notes on agenda for the Board meeting	SS-1
3.	Proof of sending and delivering draft of resolutions and necessary papers	SS-1
4.	Proof of sending draft minutes and its delivery	SS-1
5.	Proof of sending signed minutes and its delivery	SS-1
6.	Proof of sending notice of meetings	SS-2

Schedule "D"

Documents, whose preservation is required for a period of at least one year after completion of the relevant transaction

Sr. No.	Description of Documents	Reference
1	Preservation of recording of Minutes	Applicable laws as defined above

4. Archival of documents which are hosted on the website of the Company

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 policy in respect of Documents which are hosted on the website of the Company:-

a. All Documents generated, disclosed or received by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company and constitute archival material.
b. Archival material of the Company shall not be destroyed or purged without the approval of the Authorised Person.
c. 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.
d. Material so selected for preservation shall be sent to the Company archives in the category of Libraries.
e. The Authorised Person, in consultation with the Board, 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.
f. 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.
    i. Archiving of the Documents to be submitted to the stock exchange, in terms of the Regulations, shall be done after the lapse of the preservation period of 5 years, as per the archival policy.
    ii. 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. Archival of Documents

Documents maintained/preserved by the Company, as mentioned above, shall be maintained/ preserved in the following manner:

A. Documents maintained in physical form:

1. All information and/or documents pertaining to the current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to the preceding financial year, shall be kept in good condition at least up to the minimum for their maintenance period specified for their maintenance / preservation as mentioned in the Annexures attached hereto. The said records should be also maintained in such a manner that their retrieval is easy and quick.

B. Documents maintained in electronic form:

1. All documents pertaining to the current financial year and for the preceding financial year shall be maintained on server/cloud, and backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.

2. Back up of all documents pertaining to the period prior to the preceding financial year shall also be maintained on server in good condition at least up to the minimum period specified for their maintenance/ preservation. The said records should be also maintained in such a manner that their retrieval is easy and quick.

After the expiry of the time mentioned in Clause 5 of this Policy (i.e. five financial years preceding the current financial year), the information be and/or document shall be removed from the main website.

The backup of said information and/or document, which is removed from the main website, shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years, the backup may be permanently removed from the server.

6. Disposal of Documents

The registers/documents mentioned above may be destroyed in accordance with the provisions of the Applicable Law, after the approval of the Board of Directors of the Company and in the presence of the Compliance Officer.

The Company shall maintain a Register of Records and Documents Destroyed under this policy , containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction, etc., each entry in this register shall be verified by the Company Secretary and countersigned by the Chief Compliance Officer and Chief Financial Officer.

7. Exclusion

Documents/records in respect of which any investigation/enquiry is pending, or in respect of which any legal proceeding is pending, or which is part of any legal dispute, are not covered under this Policy.

8. Amendments

The Board of Directors may amend, modify and change this Policy in part or the entire Policy, at any time, as it may deems fit in accordance with the applicable laws. Any change/amendments in applicable laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy. The Policy shall be subject to review at least on an annual basis.

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