

ARCHIVAL POLICY OF FINOVA CAPITAL PRIVATE LIMITED

1. INTRODUCTION AND OBJECTIVES:

- 1.1. Finova Capital Private Limited (hereinafter referred to as “the Company”) has framed this Archival Policy (hereinafter referred to as “Policy”) pursuant to Regulation 51 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”).
- 1.2. Regulation 62 of Listing Regulations requires the listed Companies to maintain a functional website containing the information about the Company as prescribed therein and to update the same within two working days of any change taking place therein.
- 1.3. Regulation 51(3) of the Listing Regulations prescribes that Company shall disclose on its website, all such events or information which have been disclosed to the stock exchange(s) under regulation 51 of the Listing Regulations and such disclosures 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.
- 1.4. Accordingly, Company has formulated this policy for ensuring maintenance and archival of its disclosures, documents and records that are placed on its website www.finoval.in
- 1.5. The objective of this Policy is to ensure that all the documents, disclosures made to the stock exchange(s) pursuant to the Listing Regulations are hosted on the website of the Company and transferred to the Archives folder of the website after the completion of five years from the date of disclosure or event.

2. DEFINITIONS AND INTERPRETATION:

- 2.1. "**Act**" means the Companies Act, 2013, Rules framed thereunder as amended from time to time;
- 2.2. "**Board of Directors**" or "**Board**" means the Board of Directors of Finova Capital Private Limited as constituted or re-constituted from time to time;
- 2.3. "**Company**" means Finova Capital Private Limited;
- 2.4. "**Listing Regulations**" or "**SEBI Listing Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time;
- 2.5. "**Policy**" or "this Policy" means Archival Policy
- 2.6. The words and expressions used and not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, and/or any other SEBI Regulation(s) as amended from time to time.

3. ARCHIVAL POLICY

- 3.1. The Company is required to submit/disclose/file various information, financial statements/results, notices and other disclosures, as required under SEBI regulations to Stock Exchange(s) where the non-convertible debentures of the Company are listed. As required under the Act and the SEBI Listing Regulations the same are also displayed and hosted on the website of the Company.
- 3.2. All the disclosures made by the Company to the Stock Exchange(s) under Regulation 51 of the Listing Regulations, shall be hosted on the website of the Company namely www.finova.in for a minimum period of 5 years.
- 3.3. In case the aforesaid disclosures are required by any applicable law or regulation to be hosted for a period longer than that mentioned above, such disclosures shall be hosted on the website of the Company for such longer period.
- 3.4. After a period of 5 years from the date on which such disclosures/ announcements were made, all such announcements/ disclosures on the website of the Company would be moved/transferred to the archives folder under the respective heads / sub-folders, in a way so that these can be searched easily as and when required by any person. The archived folder would be available for a period of one year. After the expiry of said time period, the disclosures of information and events may be removed from the website of the Company.
- 3.5. The contents on the website of the Company shall be reviewed on regular intervals for ensuring that all the above-mentioned disclosures are available on the website of the Company as required. The Company should ensure to update any change in the content of the website within two working days of such change.
- 3.6. In the event any documents are required to be hosted on the website of the Company for a particular period, the same shall be deleted after the due date, and accordingly shall not be saved to archives folder.
- 3.7. Certain documents like Policies, Codes of Conduct and other documents which are required to be continuously displayed on the website, shall not be archived.
- 3.8. This policy governs the disclosure and archival of such contents only which have been disclosed on the website of the Company pursuant to the compliance with the abovementioned Regulations and which are disclosed with Stock Exchange(s). Other contents displayed / hosted on the website shall be out of purview of the Policy and can be archived / deleted as per the requirement of the content.

4. DISCLOSURE OF POLICY

- 4.1. The policy shall be hosted on the website of the Company at www.finova.in after the approval of the Board of Directors and after every amendment/updation thereof.

5. SEVERABILITY AND LAWS TO TAKE PRECEDENCE

- 5.1. This Policy constitutes the entire document in relation to its subject matter. In the event that any term, condition or provision of this Policy being held to be a violation of any applicable Law, statute or regulation, the same shall be severable from the rest of this Policy and such provision shall be of no force and effect, and this Policy shall remain in full force and effect as if such term, condition or provision had not originally been contained in this Policy.
- 5.2. If any of the provisions of this Policy are inconsistent with the applicable laws, then the provisions of applicable laws shall prevail over the Policy to that extent and the Policy shall be deemed to have been amended so as to be read in consonance with applicable laws. Any subsequent amendment(s)/modification(s) in the applicable laws in this regard shall automatically apply to this Policy.

6. REVIEW OF THE POLICY AND AMENDMENTS

- 6.1. The Board will review this policy at such intervals as may be required on the regulatory and business exigencies.
- 6.2. Any change/amendment/modification in the policy shall be approved by the Board. As this Policy is pursuant to the applicable laws, if any change to applicable laws or interpretation thereof necessitates any change to the Policy, this Policy shall be read so as to accommodate the changes and necessary amendment shall be carried out at a subsequent date in the policy. The Company Secretary will review the Policy to give effect to above, as and when need arises, till such time as the Board makes the necessary changes to the Policy. The Board shall have the right to withdraw and / or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, subject to applicable law in force.

Approved/Last updated on: October 31, 2022