

PYXIS FINVEST LIMITED

Policy on preservation of documents

[Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]
Version 2.0

Legal Provision

- The Companies Act, 2013 (“Act”) r/w rules made thereunder
- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”) as updated from time to time.

Background

Pyxis Finvest Limited is an RBI registered NBFC listed on SME platform of BSE Ltd under scrip code 534109.

Objective

The objective of this Policy is to establish a robust framework for the classification, preservation, and eventual destruction or disposal of the Company’s “Documents and records” (i.e. all papers, records, files, books, tapes, CDs, DVDs, storage devices etc., both in physical and electronic form, and the like as required to be maintained under any law or regulation for the time being in force), in compliance with applicable laws.

Mode of Preservation

Documents and records may be preserved either physically or in electronic form. Electronic records must be stored with access control and periodic backup.

Tenure of preservation

- The documents listed in *Annexure 1* shall be maintained and preserved **permanently**
- The documents listed in *Annexure 2* shall be preserved by the Company for the term **not less than 8 years** after completion of the relevant transactions

Archiving of Records

- Archived data will be stored in a **non-editable PDF format**, properly indexed, and time-stamped.
- Access to archived documents will be restricted to authorized personnel.

Destruction of Records

- Records will be reviewed annually, and those due for disposal will be destroyed with the approval of the Board of Directors.
- A **Destruction Register** may be maintained.
- If the Company receives a notice for documents from a statutory authority, or if litigation involving the Company begins, the disposal of relevant documents will be suspended until the matter is resolved.

Website

The Company shall ensure that all events or information disclosed to the stock exchange(s) pursuant to Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, are also made available on its website for a minimum period of **5 years**.

Review/Amendments to this policy:

The above said policy was reviewed and approved with changes by the Board of Directors in their meeting held on 3rd September, 2025

For Pyxis Finvest Limited

Sd/-

Uttam Bharat Bagri
Managing Director
DIN: 01379841

Annexure 1
Documents whose preservation shall be permanent in nature

- i. Registration Certificate
- ii. Memorandum and Articles of the Company
- iii. Affidavit from the subscribers to the memorandum and from person named as the first directors
- iv. Statutory registers required under applicable laws
- v. Audited financial statements
- vi. Minutes of Board/General/Committee Meetings
- vii. Material Agreements/Contracts
- viii. Order issued by Courts/Statutory Bodies
- ix. Any other documents as **may be required to be maintained permanently** in terms of applicable law(s)

Annexure 2
Documents with no specific preservation period

1.	Books of Account (including vouchers, etc.) [Section 128(5)]	8 years immediately preceding the current year.
2.	Register of Debenture Holders / Other Security Holders [Section 88(3) r/w Rule 15(2)]	8 years from the date of redemption of debentures/securities.
3.	Annual Return (MGT-7) [Section 92]	8 years from filing with the Registrar.
4.	Resolutions passed by postal ballot [Rule 22(10) of Companies (Management and Administration) Rules, 2014]	8 years from the date of passing the resolution.
5.	Instrument creating charge or modification [Section 85 r/w Rule 10 of Companies (Registration of Charges) Rules, 2014]	8 years from the date of satisfaction of charge.
6.	Register of Charges [Section 85 r/w Rule 10]	8 years from the date of satisfaction of charge.
7.	Register of Loans, Guarantee, Security, and Acquisition of Securities (MBP-2) [Section 186(9)]	8 years from the date of entry.
8.	Register of Contracts and Arrangements in which directors are interested (MBP-4) [Section 189(3)]	8 years from the date of entry.
9.	Register of Directors and KMP [Section 170]	8 years from the date of cessation.
10.	Register of Employee Stock Options (ESOP) [Rule 12(10) of Companies (Share Capital and Debentures) Rules, 2014]	8 years from the date of grant of options.
11.	Declaration of Beneficial Interest in Shares (BEN-1, BEN-2, BEN-3) [Section 89 and Rules under Companies (Significant Beneficial Owners) Rules]	8 years from the date of cessation of beneficial interest.
12.	CSR Records – including project reports, monitoring details, etc [Section 135 read with CSR Rules]	8 years (as per good governance and audit requirements; not explicitly prescribed but guided by general retention principles).
13.	All notices pertaining to disclosure of interest of directors	8 years from the date of receipt
14.	Non-Statutory Registers/Documents	8 years from the date of transaction
15.	Share Certificates surrendered to a Company	8 years from the date of surrender
16.	Correspondence with Department/Shareholders	8 years from the date of transaction
17.	Any other documents as may not be required to be maintained permanently in terms of applicable law(s).	8 years from the date of transaction