

RECORD MAINTENANCE POLICY

True Beacon Investment Advisors LLP

*Registered with the Securities and Exchange Board of India as a Portfolio Manager with effect
from 9 March 2022*

Registration No. INP000007353

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INTRODUCTION

- 1.1 True Beacon Investment Advisors LLP (“**Portfolio Manager**” or “**we / us**”) has been constituted under the Limited Liability Partnership Act, 2008 and registered with Securities and Exchange Board of India (“**SEBI**”) as a portfolio manager under the SEBI (Portfolio Managers) Regulations, 2020 (“**PM Regulations**”) with effect from 9 March 2022 bearing registration number INP000007353. By virtue of this registration, the Portfolio Manager is a registered intermediary with SEBI under Section 12 of the SEBI Act, 1992.
- 1.2 In this record maintenance policy (“**Policy**”), words and expressions shall, unless expressly defined herein, have the meaning ascribed to them in the disclosure document prepared by the Portfolio Manager in accordance with the PM Regulations and filed with SEBI (“**Disclosure Document**”) or respective portfolio management agreements executed between the Portfolio Manager and respective Clients in accordance with the PM Regulations (“**PMS Agreement**”).

OBJECTIVE

- 2.1 The purpose of this Policy is to ensure that all Records (*as defined below*) are adequately protected and maintained in accordance with the rules and regulations issued by SEBI as applicable to portfolio managers registered under the PM Regulations.
- 2.2 This Policy is also for the purpose of aiding Employees (*as defined below*) in understanding their obligations in retaining electronic Records.
- 2.3 The Portfolio Manager reserves the right to amend the terms of the Policy at its discretion and details of any amendments will be communicated to all the Employees by an internal communiqué.

GENERAL

- 3.1 This Policy applies to all regular employees, contract employees, fixed term employees, including but not limited to directors, committee members, officers, secondees, contractors, consultants, advisers, nominees and other representatives of Portfolio Manager and any other persons associated with the management and administration of the Portfolio Manager (collectively, “**Employees**”).
- 3.2 This Policy refers to the retention of all physical and electronic records created by the Portfolio Manager and/or Employees in relation to (i) investment transactions or recommendations made to Clients (with such records indicating the data, facts and opinion leading to such investment decision / recommendation), (ii) copies of all portfolio management agreement signed with Clients, (iii) all versions of the disclosure documents as amended from time to time, and (iv) copies of balance sheets, profit and loss accounts, auditors’ reports on the accounts and statements of financial position for each financial year / accounting period, in the form of e-mails, web files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files (“**Records**”).
- 3.3 During the provision of investment advisory services to Clients, the Portfolio Manager shall, in addition to the Records defined in **paragraph 3.2**, maintain records of interactions related to investment advice with Clients and prospective Clients in the form of physical records written & signed by Client, telephonic recordings, emails from registered email ids, records of text messages via SMS, or any other

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legally verifiable record (“**Advisory Records**”). Such Advisory Records must be maintained starting from the first interaction with the Client until the completion of providing investment advisory services to the Client.

- 3.4 The Portfolio Manager shall maintain and cause the Employees to maintain Records for a minimum period of 5 (five) years from the date of creation of such Record.
- 3.5 The Portfolio Manager may undertake to dispose of such Records upon the completion of 5 (five) years from the date of creation of such Record in a manner as may be necessary to maintain confidentiality of the Record so disposed.
- 3.6 The Portfolio Manager shall intimate SEBI of the place where the books of accounts, records and documents are maintained on a periodic basis.