

RECORD MANAGEMENT & RETENTION POLICY

(PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY)

V5.0

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1. Preamble

1.1 As per Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), Fino Payments Bank Limited (“**Company**”/“**Bank**”), the Bank is required to formulate (and have approved by its board of directors) a policy on preservation of documents, classifying them in at least two categories as follows:

- (a) documents whose preservation shall be permanent in nature;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions:

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

AND

1.2 As per Regulation 30(8) of the Listing Regulations the Company is required to formulate a policy on the archival of documents and such policy shall be disclosed on the company’s website. The documentation should cover **protection, maintenance and archival of disclosures, documents and records that are placed on the website of the Company in accordance with regulations 30(8) and 46 of Listing Regulations.**

1.3 In compliance of the provisions above, the policies of the Company on Preservation of Documents and Archival of documents has been collated in one policy document.

TITLE: This policy shall be called as 'Preservation of Documents and Archival Policy of Fino Payments Bank Limited.

2. Purpose

The purpose of this policy is to create a formal written guideline about proper storage of records, its retrieval & withdrawal for reference, redeposit and ultimately its disposal where applicable. The guidelines have been drawn up after taking into consideration above aspect and given in the following contents.

All records in offices whether current or non-current are required to be taken proper care of. It is essential to have proper storage, retrieval and disposal controls of such records, as the bank deals day in day out with various types of records. Current as well as non-current records need to be preserved carefully, so that they are available for any reference in future. Therefore, handling of documents / records assumes great significance.

3. Scope

- 3.1 The scope of this policy is to provide guidelines for standard procedures for storage, retrieval and disposal of all important physical & electronic records that require to be preserved as per organisational / statutory/ regulatory requirements, and as amended from time to time, to be followed in the Company. The guidelines are applicable to Head Office, Central Office, Zonal Office and branches, and covers the following types of records:
- i. Records to be preserved permanently
 - ii. Records to be preserved for not less than 10 years
 - iii. Records to be preserved for not less than 8 years
 - iv. Records to be preserved for not less than 5 years
 - v. Records to be preserved for not less than 3 years
 - vi. Records to be preserved for not less than 2 years
 - vii. Records to be preserved in respect of Govt. transactions.
- 3.2 Records arise on account of transactions/functions performed by the Bank and relate to the data and information arising there from. Records include vouchers, ledgers, registers, forms, reports, returns/statements, office notes, cheques, etc. The provisions of the policy shall apply for both physical & electronic records.
- 3.3 The determination of the media by which records shall be stored will be based on the following:
- i. Compliance with the statutory/regulatory requirements.
 - ii. The need to ensure that media chosen does not conflict with accessibility requirements of RBI inspectors/ Internal/External auditors.
 - iii. Physical condition under which the record will be stored.
 - iv. Appropriate controls over the conversion process when records are converted from paper form to non-paper form including certification for authenticity at the time of conversion, with adequate security/precautions.

4. Electronic Records

- 4.1 Application Business owner (The business owner of the process) shall identify necessary data and retention period of data generated out of the specific application that needs to be retained as prescribed in this policy. Bank's IT team shall backup Transaction Data regularly according to the Backup Policy to maintain the records containing information of all the transactions and retrieve easily and quickly whenever required or when requested by the competent authorities. There are perimeter and application level securities are implemented at various forms (Masking, Encryption, accessibility etc.) to ensure need to know basis access. Access logs are maintained for any forensic investigation. Bank shall adhere to following measures to ensure proper retention and archival of electronic records.
- i IT team of the Bank shall back up Email mailbox store regularly according to the Backup Policy.
 - ii The records pertaining to the KYC shall be retained as per regulatory requirement.

- iii Individual user specific critical files/folders shall be preserved and backed up regularly which needs to be retained. Individual user to coordinate with the IT team to get the space allocated and backed up.
- 4.2 Generally, Record's location will be in the same branch/office where the records were generated / used. In case the location is to be at a different place, the same should be as per duly approved process of data maintenance at remote location. The overriding principle is that records continue to be available to management on a timely basis.

5. Time limits for preservation of records

- 5.1 The Government of India has laid down certain regulations for the preservation of old records and documents of banks. Under these regulations, certain records and documents are to be preserved permanently while some others are to be preserved up to 10 years, 8 years, 5 years, 3 years and 2 years. Indicative list of the different types of documents to be preserved permanently & for different tenures are given in **ANNEXURE 1**.
- 5.2 Any reference to the records can be resorted to only if the preservation is made systematically and in an orderly manner.
- 5.3 In case of unclaimed deposits, the liability continues to be outstanding and the Bank shall be required to maintain / preserve records related to such unclaimed deposits. The Bank shall not destroy the same and shall take necessary care in preserving the records pertaining to the unclaimed deposits till the outstanding is paid or necessary actions are taken as per prevalent guidelines.

6. Place of Storage – Physical records

- 6.1 The Bank shall identify and approve a place of storage to keep required records safely. Approved locations are annexed.
- i. Based on the storage requirements Bank may choose to store records externally. For this purpose Bank may identify suitable vendor who will professionally store and manage records. Vendor, if any, selected will be subject to Bank's outsourcing policy. Unit using such facility to ensure adherence to this policy.
 - ii. While selecting a storage vendor, Bank should take into account the following requirements with Storage Vendor (SV), in light of the type & importance of the document proposed to be stored –
 - a. Necessary infrastructure required to service needs.
 - b. Equipped with adequate security & access controls.
 - c. Availability of fire detection & fire fighting systems, Pest control.
 - d. Scalability and BCP arrangement.
 - iii. Proper care has to be taken that current records placed in the Bank premises are also well secured. Digital data to be secured as per the backup policy that ensure availability of data at any point of time for retrieval.

7. Indexing

- 7.1 Following information should be available with the record owning unit with respect to records preserved -
- i. Record Owner Dept. / Name
 - ii. Type / nature of Records
 - iii. Date/Period of the Record/s
 - iv. Record category –
 - a. High Risk / Primary records –Records that cannot be re-produced from the Bank's systems and documents if lost/damaged or record that need to be stored permanently / or for a specific period of time as per statutory / regularity guidelines. eg. 1) Account Opening documents 2) KYC documents 3) /Transaction records / Vouchers / Cheques 4) Legal records including the records which may be required by court/law enforcement agencies & fraud related records. HOD of record owning unit will determine how to store these records safely.
 - b. Secondary Records –Any record which is not categorized as a primary / high risk record e.g. internally source department records that need to be stored temporarily for period as decided by the record owing team.
 - v. Qty. where applicable
 - vi. Retention Period

Destruction Date (where applicable). Appropriate register should be maintained physically or electronically for the reference that includes all related data about origin, owner, approving authority, reference details etc for traceability.

8. Archival

The information as required shall be displayed on the website of the Bank for Mandatory Hosting Period and thereafter shall be archived in accordance with Listing Regulations.

9. Procedure to be followed for Storage, Retrieval and Permanent Withdrawal / Destruction of the physical records stored with external storage vendor

The process record movement should have proper approval mechanism with tracking of the movements of records in specific format as per Annexure 2.

Information of movement of records between the bank and vendor should be available with record owning unit. Evidence of hand over to record storage vendor should be available with the record owning unit. Such unit should develop a process for periodic review. Nevertheless, all the functionaries within the Bank shall follow the basis safety and control measures as prescribed below while storing /retrieving/ withdrawing/ destructing the physical records:

- 9.1 Adequate safety and control should be exercised to store / retrieve primary & high risk records by record owning unit. High Risk records movement should be controlled with appropriate process where the Vendor and the movement responsible team adhere to higher safety mechanism in terms of transport protection fire, misplacement etc.
- 9.2 Withdrawal of any records has to be carefully made and it is to be ensured that, after

reference, the item is placed back in the records without unreasonable delay, with necessary authentications. Relevant information of withdrawal and redeposit back with storage vendor should be available with the record owning unit.

- 9.3 In all cases, where records are to be taken possession by the Court/Police/Governmental authorities, a written requisition has to be taken and an acknowledgement obtained from the recipient in respect of the particular record to be taken possession of or delivered to, duly retaining copies of the records so handed over / delivered. All such requests are to be brought to the notice of HODs & Legal/AFU team (as applicable) for guidance.
- 9.4 The register as appearing in Annexure 2 must be filled by all the employees of the Bank requesting for movement of physical records. Procedure should be implemented where every record, regardless of who is taking possession of it, must be requested for in writing and acknowledged to have been taken by such person. Approval should be mandatory for key documents and a matrix may be included specifying the mode of obtaining such approval (for example, the types of different key documents, the persons authorised to give approval for their retrieval, etc. The legal department's approval must be sought for the retrieval of documents with a confidentiality clause.

10. Filing

Filing is an important aspect of the office administration. The objective of the filing system is to ensure timely availability of papers and avoid any uncertainty about their location in the office. Each department should evolve a good filing system best suited to its needs.

11. Physical Records required as evidence

- 11.1 Original physical records which are required as evidence in any matter of investigation or which have to be produced in a court of law should be stored carefully under the responsibility of designated / authorised person. Exact authenticated copies or Photostat copies of such original records when removed should be placed in the storage instead and information should be available with the record owning unit as to the circumstances under which the original records were removed.
- 11.2 Whenever other records such as ledgers, registers, books, forms, etc., are required in evidence whether they are currently in use or preserved as old records, the provisions under Bankers Book Evidence Act will be applicable. All records which may be required in connection with investigations or court cases shall be kept safely under the responsibility of designated / authorised person.

12. Permanent Withdrawal & Destruction:

- 12.1 Bank can retrieve the records permanently out of the Storage Vendor Record Centre with appropriate justification and approval mechanism that the HODs can define for specific department.
- 12.2 Where ever original records are submitted with any regulatory / law enforcement agency, appropriate request should be available in writing. Due acknowledgement (e.g; seizure memo) should be procured and stored along with copy of the record handed over. Concerned department to maintain full record of such cases. All submissions to Law Enforcing Agencies to be mandatorily approved by Legal and

AFU team. However, in case of regulatory requirements, it should be approved by Legal and Compliance. Where required, copies of the documents submitted and the seizure memo should be inserted back into the file with storage facility for future reference.

- 12.3 Request for Permanent withdrawal or destruction will first be authorized by HOD only of record owning unit.
- 12.4 Post HOD Approval, all items listed for destruction should be checked with legal for any Hold Destruction Orders and cleared by legal team where required.
- 12.5 Post approval of HOD and Legal/Compliance, the request to be raised by record owning unit to Storage Vendor for retrieval of the physical records.
- 12.6 Upon receipt of records, they will be destroyed with the secure destruction process (shredder) in presence of authorized Bank staff of the record owning unit. Due care should be taken to ensure only records eligible and approved for destruction are destroyed. HOD needs to approve destruction of such records; review mechanism to be put in place.
- 12.7 All departments who requested for permanent withdrawal or destruction should maintain proper records of the request.
- 12.8 After disposal of the records, a certificate has to be obtained from the Vendor and maintained along with other relevant details by record owning unit for future evidence, audit etc.

13. Audit

Periodical review / audit of the vendor and the activities associated with record management shall be carried out by internal audit.

14. Prevention of Money Laundering Act, 2002 (“the Act / PML Act”) - Rules for Maintenance of Records

- 14.1 These rules may be called the Prevention of Money-laundering (Maintenance of Records of the Nature and Value of Transactions, the procedure and Manner of Maintaining and Time for furnishing information and verification and maintenance of records of the identity of the clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 (“Rules”). This has come into force from 1st July 2005.
- 14.2 Definitions
 - 14.2.1 In these rules, unless the context otherwise requires:-
 - i "client" means a person who engages in a financial transaction or activity with a banking company, or financial institution or intermediary and includes a person on whose behalf the person who engages in the transaction or activity, is acting;
 - ii "transaction" includes deposit, withdrawal, exchange or transfer of funds in whatever currency, whether in cash or by cheque, payment order or other instruments or by electronic or other non-physical means
 - iii "suspicious transaction" means a transaction as referred above, including an

attempted transaction, whether or not made in cash, which to a person acting in good faith –

- a. Gives rise to a reasonable ground of suspicion that it may involve proceeds of crime or
- b. Appears to be made in circumstances of unusual or unjustified complexity or
- c. Appears to have no economic rationale or bona-fide purpose; or
- d. Gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

Explanation: Transaction involving financing of the activities relating to terrorism includes transaction involving funds suspected to be linked or related to, or to be used for terrorism, terrorist act or by a terrorist, terrorist organization or those who finance or are attempting to financing of terrorism.

14.2.2 All other words and expressions used and not defined in these rules but defined in the Act shall have the meaning respectively assigned to them in the Act.

14.2.3 Maintenance of Records of Transactions (nature and value) According to this Rule, Bank shall maintain a record of -

14.2.4 All cash transactions of the value of more than Rs.10 lakhs or its equivalent in foreign currency;

14.2.5 All series of cash transactions integrally connected to each other which have been valued below Rs.10 lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ten lakh rupees or its equivalent in foreign currency;

14.2.6 All transactions involving receipts by non-profit organizations of value more than rupees ten lakh, or its equivalent in foreign currency;

14.2.7 All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security or a document has taken place facilitating the transactions;

14.2.8 All suspicious transactions whether or not made in cash and by way of-

- i Deposits and credits, withdrawals into or from any accounts in whatsoever name they are referred to in any currency maintained by way of -
 - a. Cheques including third party cheques, pay orders, demand drafts, cashier's cheques or any other instrument of payment of money including electronic receipts or credits and electronic payments or debits, or
 - b. Travellers cheques, or
 - c. Transfer from one account within the same banking company, financial institution and intermediary, as the case may be, including from or to Nostro and Vostro accounts, or
 - d. Any other mode in whatsoever name it is referred to;
- ii credits or debits into or from any non-monetary accounts such as d-mat account, security account in any currency maintained by the banking company, financial institution and intermediary, as the case may be;

- iii money transfer or remittances in favour of own clients or non-clients from India or abroad and to third party beneficiaries in India or abroad including transactions on its own account in any currency by any of the following:
 - a. Payment orders, or
 - b. Cashier's cheques, or
 - c. Demand drafts, or
 - d. Telegraphic or wire transfers or electronic remittances or transfers, or
 - e. Internet transfers, or
 - f. Automated Clearing House remittances, or
 - g. Lock box driven transfers or remittances, or
 - h. Remittances for credit or loading to electronic cards, or
 - i. Any other mode of money transfer by whatsoever name it is called;
 - j. Collection services in any currency by way of collection of bills, cheques instruments or any other mode of collection in whatsoever name it is referred to.

14.2.9 Records containing information

The records referred to in Para 12.2.3 above shall contain the following information:

- i the nature of the transactions;
- ii the amount of the transaction and the currency in which it was denominated
- iii the date on which the transaction was conducted, and
- iv the parties to the transaction

14.2.10 Procedure and manner of maintaining information

Bank shall maintain information in respect of transactions with its client referred to in Para 14.2.3 in hard and soft copies in accordance with the procedure and manner as may be specified by its Regulator (Reserve Bank of India or Securities and Exchange Board of India etc.), as the case may be, from time to time.

14.2.11 Retention of records of transactions

- i The Bank shall maintain for at least ten years from the date of transaction between the bank and the client, all necessary records of transactions, both domestic or international, which will permit reconstruction of individual transactions
- ii Bank shall ensure that records pertaining to the identification of the customer and his address (e.g. copies of documents like passports , identity cards , driving licenses , PAN Card, utility bills etc) obtained while opening the account and during the course of business relationship are properly preserved for at least ten years after the business relationship is ended
- iii Bank shall ensure that records relating to all complex, unusual large transactions and all unusual large transactions and all unusual pattern of transactions , which have no apparent economic or visible lawful purpose are preserved for ten years

The provisions are to be read in cross reference to KYC/ AML/ CFT (Combating the Financing of Terrorism) Policy.

15. Review of the Policy

The policy shall be reviewed annually or in tune with applicable regulatory guidelines issued from time to time. Any changes/ amendments/ relaxations/exemptions, required to be made in the Policy, shall be recommended by Product and Process Approval Committee of the Bank for approval by the Board.

16. Review of the Policy

Bank shall also adhere to all regulatory instructions, as applicable, in respect of record retention and retrieval mechanism as part of the following guidelines and requirements:

- i. Provisions of PML Act and Prevention of Money-Laundering (Maintenance of Records) Rules, 2005
- ii. Master Direction - Know Your Customer (KYC) Direction, 2016 dated February 25, 2016 issued by RBI
- iii. Implementation of Cheque Truncation System (CTS) dated September 18, 2014 by RBI
- iv. Retention schedule under the banking companies (period of reservation of records) rules, 1985
- v. Companies act, 2013
- vi. Bankers' Books Evidence Act, 1891
- vii. SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015
- viii. Baking Regulations Act, 1949
- ix. Income Tax Act, 1961
- x. Indian Evidence Act, 1812
- xi. Information Technology Act, 2000

Annexure 1

Periodicity for Books, Accounts, Reports, Data and Other Documents

Illustrative list of Documents to be preserved are given below

A. Records / Reports / Data / other Documents to be preserved permanently (HO, ZO, Branch and all other Offices)

- 1) Certificate of Incorporation of the Company and Certificate of Change of name of the Company, if any
- 2) Memorandum and Articles of Association
- 3) Common Seal
- 4) Authorization / licenses obtained from any statutory authority
- 5) Register and Index of Members.
- 6) Minutes Books of Board, Committee and General meetings as per the Companies Act, 2013 and circular resolutions, if any.
- 7) Register of Loans and Investments as per Companies Act, 2013.
- 8) Dividend Warrants Register and Dividend files.
- 9) Transfer Deed Files.
- 10) Counterfoils of Share Certificates.
- 11) Register showing the Beneficiary Position – BENPOS (Shares lying in Register).
- 12) Share Renewals, Sub division, Duplicates and consolidated Register.
- 13) Share application forms.
- 14) Register of Mortgages and Charges.
- 15) Policies of the Company adopted under various regulations.
- 16) Annual Audit Reports and Financial Statements
- 17) Interim Financial Statements
- 18) Annual Audit Records, including work papers and other documents that related to the audit.
- 19) Provident Fund Registers.
- 20) Provident Fund Loan Ledgers.
- 21) Provident Fund General Ledgers.
- 22) Provident Fund Day Book.
- 23) Provident Fund Investment Register.
- 24) Register of Loans and Investments as per Companies Act, 2013.
- 25) Staff Security Registers.
- 26) Staff Service Records.
- 27) Salary Summary.
- 28) Staff File Index book (Permanent but with the department until new one is prepared).
- 29) Register of Power of Attorney, Succession Certificates, Death Certificates etc.
- 30) Records relating to transactions which are in dispute.
- 31) Premises and properties files and records.
- 32) Powers of attorney (Current and Savings Bank).
- 33) Leave Record Register.
- 34) Account opening forms of Current and Savings Bank and other Accounts including ATM, Credit Card, Net Banking etc. with copy of proof of identity and address and other documents –10 years from the date of closure of the account.
- 35) Specimen Signature cards. - 10 years from the date of closure of the account.
- 36) Key Movement Register (Key Register).
- 37) General Ledger.
- 38) Specimen Signature files or books.
- 39) Confidential Files and files relating to Industrial Disputes and Writ Petitions/ Files

- pertaining to CBI/ Court Cases
- 40) Corporate Office Circulars.
 - 41) Claims Files.
 - 42) Corporate Office Correspondence.
 - 43) Sundry Assets Files.
 - 44) Credit Information Book.
 - 45) Office Order Book.
 - 46) Furniture files.
 - 47) Indemnity Bonds.
 - 48) ATM Card / Debit Card issue –Registers/Applications.
 - 49) Default Account intimation for funds transfer, utility payment in respect of Tele Internet banking Registers/Applications.
 - 50) Acknowledgement for receipt of PIN/ Password/User ID.
 - 51) Vendor Agreements / Third party Agreements.
 - 52) Pre- migration Data Backup (Physical).
 - 53) User Identification Register.
 - 54) Register indicating Records held in Electronic Form.
 - 55) Booklet supplied by RBI to identify the names of the parties black listed and necessary amendments.
 - 56) Claim application on account of deceased account holders.
 - 57) REPO Register.
 - 58) EM Register.
 - 59) Data processing Policy along with account related records pertaining to purchases/orders.
 - 60) Hardware/Software Register.
 - 61) RBI Inspection Reports/Notes.
 - 62) Bonus Register / File.
 - 63) Complaint Register / File.
 - 64) Document Execution Register
 - 65) Branch Document Register.
 - 66) Register of Records and Movement of old records.
 - 67) Register of Records sanctioned for destruction.
 - 68) Register of Records destroyed.
 - 69) Register of documents.
 - 70) Library Books Register.
 - 71) Internal Documents (Sanctions / Approvals etc.) of the Administrative Offices.
 - 72) Records which are to be preserved for a period of TEN years after the termination of an account or business relationship 1. Records pertaining to the identification of the customer and his address (viz. Copies of documents like Passport, Identity cards, Driving Licenses, PAN CARD, Utility Bills etc.) obtained while opening the account and during the course of business relationship. Similarly, the records pertaining to the identification of the beneficial owners of the entities obtained while opening the account and during the course of business relationship along with Partnership Deeds, Memorandum of Association, Article of Association, Trust Deeds etc.,
 - 73) Any other document as may be required to preserve permanently in terms of applicable law(s), preserved from time to time.

B. Records / Reports / Data / other Documents to be preserved for a period of not less than 10 years immediately preceding the current calendar year (HO, ZO, Branch and all other Offices)

- 1) Current, Savings, Term Deposits (R.D., Cash Certificates, Fixed, Short, Special term, Call Deposit etc.) Registers.
- 2) Account opening forms of Current and Savings Bank and other Accounts including ATM, Credit Card, Net Banking etc. with copy of proof of identity and address and

- other documents –10 years from the date of closure of the account.
- 3) Overdue (matured) deposit, Record of suspense, unclaimed deposit, and collection accounts etc.
 - 4) Drafts, TTs and MTs Paid Registers/ statements.
 - 5) Drafts, TTs and MTs issued Register.
 - 6) Record/Ledgers of Accounts with other Banks.
 - 7) Clearing cheques Register.
 - 8) Local Cheques Collection Register.
 - 9) Cash Receipts and Payment Books. (Scrolls)
 - 10) Clearing House Books.
 - 11) Pay slips issued book.
 - 12) All vouchers of the day's-in-slips, Cheques transactions and voucher relating to Deposits, Loans, Overdrafts, Remittances, Bills, payment to nominees etc.
 - 13) Register/book of Purchase, Sale and auction of goods and other securities.
 - 14) Interest on Deposit register.
 - 15) Remittance Register.
 - 16) Paying-in-slips and paid cheques.
 - 17) Clean Cash Book and Funds Book / Report.
 - 18) All information data, records whether paper or electronic relating to Payment System Applications.
 - 19) Physical cheques including the images of cheques (in the CTS scenario).
 - 20) Closed records relating to Disciplinary proceedings against employees (ie. after disposal of appeal / review petition, if any).
 - 21) Internal Rating proposals.
 - 22) All records relating to Cash Transaction of Value of more than Rs 10 lacks or its equivalent in Foreign Currency with transaction details
 - 23) All records relating to series of cash transactions integrally connected to each other, which have been valued below Rs 10 lacks or its equivalent in Foreign Currency, where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rs 10 lacks, with transaction details.
 - 24) All records relating to cash transactions where forged or counterfeit Currency Note or Bank Notes have been used as genuine and where any forgery of valuable security or a document has taken place facilitating the transaction, with transaction details.
 - 25) All records related to suspicious transactions, whether or not made in cash and by way of as mentioned in the rules, under PML Act.
 - 26) All records related to Cash Transaction Reports and Counterfeit Currency Report filed with FIU-IND.
 - 27) All records relating to scrutiny of complex, unusual large transactions and unusual patterns of transactions, which have no apparent economic or visible lawful purpose and the findings of the Bank thereon.
 - 28) Any other document as may be required to preserve in terms of applicable law(s), preserved from time to time.

C. Records / Reports / Data / other Documents to be preserved for a period of not less than 8 years immediately preceding the current calendar year (HO, ZO, Branch and all other Offices)

- 1) Day Book and Supplementary.
- 2) Subsidiary Ledgers.
- 3) General Accounts - register.
- 4) Sundry Assets - register.
- 5) Records of Sale and Purchase Contract (Investments on behalf of clients).
- 6) Register showing collection of Dividends and Interest on securities on behalf of constituents.
- 7) Guarantees Register (Summary of Liabilities by Guarantees and Indemnity)

- 8) Advice manifold for Import letters of credit.
- 9) Import Letter of Credit Register (Control Sheets, Ledger forms and Correspondent-wise Ledger for Letters of Credit).
- 10) Loans against documents (Loans against merchandise and trust receipts).
- 11) Counter Indemnities regarding Letters of Guarantees.
- 12) Trust Receipt Certificates.
- 13) Safe in and Safe out Registers (Securities kept in and taken out).
- 14) Lien Registers (Permanent till lien is in force).
- 15) Mandate Books (Permanent till authorization is in force).
- 16) Government Securities lodged with different Banks.
- 17) Ledgers for Forward Exchange contract.
- 18) Accounts Closed File.
- 19) Files of Drafts and F.Ds lost.
- 20) Individual Files of customers.
- 21) Account confirmation (files).
- 22) Applications for Overdraft (loans/advances).
- 23) Cash Particulars (single lock book).
- 24) Overdue loan registers (Closure of Decreed Debt and suits).
- 25) All personal ledgers.
- 26) Demand Loan Registers.
- 27) Stock registers of goods pledged.
- 28) Registers or ledgers of Bank's own
- 29) Branch ledgers.
- 30) Trust Registers.
- 31) Remittance Schedules.
- 32) Account opening forms, inventories, prepared in respect of articles in Safe Custody and Safety Lockers and nomination forms.
- 33) Standing instructions regarding Current/SB accounts.
- 34) Daily/Monthly/Yearly Backup Register and Backup movement register.
- 35) Purchase orders and other related Documents.
- 36) Claims paid pending recovery Register
- 37) Deferred payment guarantees/ forward contracts.
- 38) Register of Dividend and Interest on Securities
- 39) Register for collection of Dividend warrants.
- 40) Record of Sales and Purchases contract.
- 41) Closed files of Suit filed / writ petition / consumer forum cases.
- 42) CIBIL Data.
- 43) CIBIL Willful Defaulters Data.
- 44) Review of sanctions of ZO / Borrower wise.
- 45) Reporting Register ZO wise.
- 46) Closed files/records relating to prohibitory or attachment orders received.
- 47) Safe Custody Register.
- 48) Draft and Mail Transfer advices dispatch and advices received Registers.
- 49) Gold coins Sales Register.
- 50) Gold Coins Stock Movement Register.
- 51) Gold coin suspense Register.
- 52) Gold coin Income Register.
- 53) Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto shall be preserved for a period of eight years from the date of filing with the Registrar.
- 54) Legal documents including but not limited to contracts, legal opinions, pleadings, orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.
- 55) Books of Accounts.
- 56) ROC Filings.

- 57) Tax Records.
- 58) Any other document as may be required to preserve in terms of applicable law(s), preserved from time to time.

D. Records / Reports / Data / other Documents to be preserved for a period of not less than 5 years immediately preceding the current calendar year (HO, ZO, Branch and all other Offices)

- 1) Uncleared Bill.
- 2) Double Lock Pass Book.
- 3) Cheques stopped, returned and pass book registers
- 4) Cheques Issued Register.
- 5) Branch Information (Permanent until renewed).
- 6) Balancing Books.
- 7) Tiny Deposit Suspense Register.
- 8) Cheques Requisition File.
- 9) Bankers file (permanent till arrangement is in force).
- 10) General Files.
- 11) Legal Advisers Files.
- 12) Branches files.
- 13) Letters (Postal) Inward Register.
- 14) Dispatch Register (Postal Outward Register).
- 15) Local delivery book.
- 16) Pass books of Closed Accounts.
- 17) Brokers Contracts file.
- 18) Safe Custody Receipt- duplicates of counterfoils.
- 19) Inspection / Audit Reports.
- 20) Advices of Letters of Credit (opened by Cable).
- 21) Advice of Letters of Credit (to Correspondents - amendments).
- 22) Letters of Credit - Application forms.
- 23) Inland letters of credit- opening forms.
- 24) Leave record of Ex. Employees.
- 25) Stationery Registers.
- 26) GRI Enclosures letters to Reserve Bank.
- 27) Clearing Agents Instructions.
- 28) Bank Reference files for Airmail.
- 29) Released Guarantee of - Foreign Bills uncleared, negotiated under export bills of credit.
- 30) Delivery order form (Goods Loans and loans on Shares and loans against other securities).
- 31) Cheque Books, Drafts Books and Cash Certificates issue Register.
- 32) Demand Liability Registers.
- 33) Year End Returns Files.
- 34) Old Cyclostyled circulars and circular letters.
- 35) R.B.I. Return files.
- 36) L.I.C. of India Bankers memorandum (Duplicate).
- 37) Monthly Returns file (statement).
- 38) Managers Certificate file.
- 39) General Correspondence.
- 40) Service Charges/ Commission file.
- 41) Dormant Tiny Deposit Register and file with dormant card
- 42) Tiny Deposit confirmation letters.
- 43) Branch Adjustment Register.
- 44) General Charges Register.
- 45) Staff File (Correspondence).
- 46) PD refund forms

- 47) Confirmations for Telegrams.
- 48) Counterfoils, pay slips issued, drafts issued
- 49) Counter Indemnity - Regarding - Bills & Bills of lading.
- 50) Leave application of employees.
- 51) Token Register.
- 52) Remittance dispatched and received registers.
- 53) Confirmation of Telegram.
- 54) Festival Advance Application file.
- 55) Refund application.
- 56) Duly authenticated ATM Journal Print.
- 57) Written Instructions of Tele Banking delivery chalans.
- 58) Register for Computer consumables.
- 59) Parameter/Master modification Register.
- 60) Media in use / corrupted register.
- 61) Maintenance contract file and all related records relating to Computer Hardware.
- 62) RTI File after disposal of 1st appeal / CIC appeal.
- 63) Delivery order forms (PCL/Pledge/SL goods loan).
- 64) ECGC Circulars.
- 65) Sectoral Deployment.
- 66) Risk profile records.
- 67) NHB/Food credit/NABARD/SIDBI/EXIM BANK / CALL / CBLU / RUPU / RREPO / SFR Files.
- 68) Reciprocal, DICGC, CODE Files.
- 69) AFI File.
- 70) Equity related general file.
- 71) Vault Register.
- 72) All the loan papers, files, registers etc., pertaining to the Written off loan accounts for which DICGC claims have already been settled and adjusted to the loan accounts (5 years from the date of closure of account, of current calendar year).
- 73) Disclosures made under SEBI (Prohibition of Insider trading) Regulations, 2015 (five years)
- 74) Any other document as may be required to preserve in terms of applicable law(s), preserved from time to time.

E. Records / Reports / Data / other Documents to be preserved for a period of not less than 3 years immediately preceding the current calendar year (CO, ZO, Branch and all other Offices)

- 1) Files of rejected loan proposals.
- 2) Application forms for closed loans.
- 3) Bill realization letters received from collecting Bankers/ Branches.
- 4) Acknowledgements.
- 5) V.P. Receipts files.
- 6) NOSTRO A/c. /Position Register.
- 7) Confirmations for Telegrams.
- 8) Purchase/Sale Note.
- 9) Reconciliation sheets.
- 10) GR/SBF/EP/PP/SOFTEX Form Register/ System generated Hard Copy.
- 11) Due diligence compliance.
- 12) Review of sensitive sector.
- 13) Mid-year review.
- 14) Concurrent Auditor's Report.
- 15) LFAR - Review Report.
- 16) Progress report of the branch.
- 17) Press copy books.

- 18) Salary Book.
- 19) Book of Shares lodged for transfer.
- 20) Drawing Power Register.
- 21) Bank Transfer Scrolls.
- 22) Sub-Daybook
- 23) Call Centre Register (in soft copy)
- 24) Management Review result of ISMS (Minutes of ISO 27001 Steering Committee)
- 25) Incident Management Report pertaining to IT environment.
- 25) Results of internal audits, including implementation and effectiveness of any corrective action taken to meet ISO 27001 requirements.
- 26) Appropriate record of training on Information Security aspects
- 27) Record on time spent on information Security Management System activities (Weekly/monthly) Information Security Management System Policies, Procedures and Documents framed to meet ISO 27001 standards Document Handling and Retention Policy
- 28) Invoices and proposals from ISO 27001 Certification Agency
- 29) Records of skill experience and qualifications in the area of Information Security Management System.
- 30) Logs of Users activities, exception and security events pertaining to IT environment.
- 31) Any other document as may be required to preserve in terms of applicable law(s), preserved from time to time.

F. Records / Reports / Data / other Documents pertaining to GOVT. TRANSACTIONS: (HO, ZO, Branch and all other Offices)

- 1) Shall be preserved as per guidelines for each scheme.
- 2) Scrolls relating to Government transactions should be preserved to a period not less than 5 years immediately preceding current calendar year and consolidation sheets be preserved to a period not less than 3 years preceding the current calendar year, provided, in the meantime audit of the relative records have been done. In case, audit is not over, records should not be destroyed unless otherwise advised by the appropriate authorities or until audit is completed and related objections if any are settled finally.
- 3) In the case of documents, it should be from the date on which they cease to be effective.
- 4) In the case of ledgers and registers it should be from the date of last entry (debit or credit) in such ledger / Register.
- 5) The records involved in any investigation/fraud cases should not be destroyed without permission from the competent authority.
- 6) In case of stipulation by IT Act/any other Law regarding retention period of documents beyond the period mentioned as above, branches have to maintain such records accordingly.
- 7) Records relating to prohibitory or attachment orders served on the Bank or claim cases in respect of balances and securities in the accounts of deceased customers should be preserved until the prohibitory or attachment orders are vacated or claims are finally settled. Records relating to suits that have been filed / decreed must be preserved until the suits/decrees are finally settled. Records relating to matters which are in dispute should not be destroyed except with the specific sanction of Zonal Office.
- 8) Vouchers and other records such as ledgers, registers, books, forms etc. which are required as evidence in any matter of investigation or which have to be produced in a Court of Law are to be preserved until the final verdict of the Court. 3. Vouchers and other records such as ledgers, registers, books, forms etc. which are required in any Departmental Enquiry in the Bank are to be preserved until the finality is reached in the matter.

Annexure 2

Register of Movement of Records

Date of withdrawal	Particulars of records drawn	Purpose of withdrawal	Signature of approver with name	Signature of the receiver with Name of the dept.	Initials of the officer-in-charge	Date of return	Initials of the Officer-in-charge