

INDBANK MERCHANT BANKING SERVICES LIMITED

Policy on Preservation of Documents and archival of documents in Company's website

1. Purpose and Scope

The purpose of this document is to present a high level policy statement for M/s Indbank Merchant Banking Services Ltd. (IBMBS) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

The policy is intended to define IBMBS's preservation of documents responsibilities and to provide guidance to the executives and staff working in IBMBS, in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of IBMBS to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. Statutory Mandate

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

3. Classification of Documents to be preserved / retained

Based on the recommendation of the management of the Company, the Board of Directors have classified the following documents as detailed in Appendix to be retained and preserved for posterity.

- i. Documents that need to be preserved / retained permanently – Doc 1
- ii. Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Doc 2
- iii. Documents to be preserved electronically and archived when necessary – Doc 3.
- iv. Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – Doc 4.
- v. Documents that may be preserved / retained for a period of less than 8 years – Doc 5
- vi. Documents that may be preserved / retained for a period of more than 8 years – Doc 6

4. Principle of Responsibility of Employees for Preservation of Documents

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

5. Administration

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure.

6. Suspension of Record Disposal in the event of Litigation or Claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning IBHL or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform all the employee by mail under "Userlist" of the need to retain the documents and suspension of disposal of the same.

7. Periodical Review of the Policy by Top Management

The Policy should be flexible and easy to understand and comply with by all levels of employees. The policy should be reviewed periodically by the Top Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time and to comply with regulatory requirement.

Type of Record

1. Accounting and Finance records including Annual Financial statements
2. Insurance Records
3. Tax records
4. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.
5. Personnel file and Service Records
6. Correspondence and Internal Memoranda
7. Depository Participant Operations Records
8. Stock Broking Operations Records
9. Electronic Documents including email retention and back up
10. Merchant Banking Operations Records
11. Legal Files and Records
12. Records pertaining to Discontinued Operations
13. Miscellaneous Records

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period	Document Type
Annual Audit Reports and Financial Statements with all connected schedules	Permanent	Doc – 1
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	Doc - 2
Bank Statement and Cancelled Cheques	8 years	Doc – 2
General Ledger	Permanent	Doc – 1
Investment Records	Permanent	Doc – 1

2. Insurance Records

Record Type	Retention Period	Document Type
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent	Doc – 1
Insurance Policies for the Company	Permanent	Doc – 1
Releases and Settlements	Permanent	Doc – 1

3. Tax records

Record Type	Retention Period	Document Type
Tax-Exemption Documents and related correspondence	Permanent	Doc -1
Tax Returns – Income,	Permanent	Doc – 1
Tax work paper packages - Originals	8 years	Doc – 2
Service Tax Records	8 years	Doc – 1

4. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent	Doc – 1
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	Doc – 1
ROC Filings and Stock Exchange filings in physical and Electronic form	8 years from the date of filing	Doc - 2

5. Personnel file and service Records

Record Type	Retention Period	Document Type
Employee Deduction Authorization	3 years after termination of service of employment/retirement/resignation	Doc – 5
Payroll Deductions (PF)	3 years after termination of service of employment retirement/resignation	Doc – 5
Details regarding gratuity and retiral disbursements	3 years after termination of service of employment retirement/resignation	Doc – 5
Payroll Registers (Gross and Net)	3 years after termination of service of employment retirement/resignation	Doc – 5
Leave Records	2 years after the relevant period retirement/resignation	Doc - 5
Personnel Files of individual employees	3 years after termination of service of employment retirement/resignation	Doc - 5
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	3 years after termination of service of employment retirement/resignation	Doc - 5

6. Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

Responsibility of maintenance of the documents for Item Nos. 1 to 7 above as per this policy:
Registered Office – Accounts, Administration and Secretarial Department.

7. Depository Participant Operations Records

Record Type	Retention Period	Document Type
Responsibility of maintenance of the documents as per this policy – Account Opening Section		
Client Account Opening forms with KYC/KRA and other relevant Documents	5 years after closure of account	Doc – 5
Responsibility of maintenance of the documents as per this policy – DP Section		
<ul style="list-style-type: none"> • Request for change in Client Master Details • Demat Request Form (DRF)/ Remat Request Form (RRF) requesting for demat/remat of securities along with necessary proofs. • Delivery Instruction Slips (DIS) received from client. • Instructions from the Clearing Member for Payin/Payout of securities. • All requests regarding Pledge/Hypothecation of securities. • Requests for Transmission of securities. • Securities lending/borrowing instructions. • Record of serial numbers of DIS / Pledge issued to its Clients. • Copy of RBI approval in case of NRI clients. • Statements of accounts of Clients in soft copy. • Record of all actions taken on the exception reports generated by the system along with soft copy. • Details of grievances received from the Clients and their present status. 	5 years after closure of account	Doc – 5
All records relating to PMLA such as (i) All cash transactions of the value of more than rupees ten lakh or its equivalent in foreign currency /(ii) All series of cash transactions integrally connected to each other which have been valued below rupees ten lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceed rupees ten lakh;/(iii) All cash transactions where forged or counterfeit currency notes or bank notes have been used as	10 Years	Doc – 6

genuine and where any forgery of a valuable security has taken place;/(iv) All suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.		
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8. Stock Broking Operations Records

Record Type	Retention Period	Document Type
Responsibility of maintenance of the documents as per this policy – Dealer – Front Office		
Inward Register & Outward Register for Account opening, DIS slips, DRF/RRF requests etc received from clients	5 years after closure of account	Doc – 5
Inventory Register – For Account opening Forms	5 years after closure of account	Doc – 5
In–Person verification Register as per NSDL guidelines	5 years after closure of account	Doc – 5
DIS – Issuance Register as per NSDL guidelines	5 years after closure of account	Doc – 5
Staff Attendance Register	3 years after termination of service of employment	Doc – 5
Responsibility of maintenance of the documents as per this policy – Centralised Back Office Operations		
Running Account Settlement	5 years	Doc – 5
Accounting Vouchers pertaining to Account opening, Receipts & Payments from and to Clients, recovery of Trading & DP dues, issue of physical contract notes to clients etc.	8 years	Doc – 2
BRS, RTGS confirmation, Bank statements pertaining to the current accounts maintained for client and stock exchange operations.	8 years	Doc – 2
Responsibility of maintenance of the documents as per this policy – Surveillance/Systems Department		
Exchange alerts and Trading limits set to clients	5 years	Doc – 5
Annual maintenance contracts for computer systems / Data center / printers /software and other service providers	5 years	Doc – 5

9. Electronic Documents including email retention and back up

- Electronic Mail : Not all email needs to be retained, depending on the subject matters
 - All e-mail – from internal and external sources to be deleted after 24 months.
 - Staff will strive to keep all but an insignificant minority of their email related to business issues.

- Staff will take care not to send confidential / proprietary information to outside sources.
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.

Responsibility of maintenance of the documents as per this policy – **Surveillance/Systems Department**

10. Merchant Banking Operations Records

Record Type	Retention Period	Document Type
Assignment wise Due Diligence Records	10 years	Doc – 6
Complaint / Investor Grievance Register	5 years	Doc – 5

11. Legal Files and Records

Record Type	Retention Period	Document Type
Legal Memoranda and Opinions	3 years after the closure of the matter	Doc – 4
Litigation files	1 year after expiration of disposal of the case	Doc – 4
Court Orders	Permanent	Doc – 1

12. Records pertaining to Discontinued Operations

All Lease / Hire Purchase / Intercorporate Deposits / Un-quoted investments / Bought Out Deals records are kept until 3 years after the closure of the account after outstanding amount is fully recovered from the party either through Court settlement or through compromise proposal approved by Board.

Responsibility of maintenance of the documents for Item Nos. 10, 11 & 12 above as per this policy: **Registered Office – Merchant Banking & Advisory**

13. Miscellaneous Records

Record Type	Retention Period	Document Type
Consultant Reports	3 years	Doc – 5
Policy and procedures manuals – Original	Current version with revision history	Doc – 5
Policies and procedures manuals - Copies	Retain current version only	Doc – 5
Annual Reports	Permanent	Doc -1

Document Type: Doc 3

Electronic Documents including PDF files.

- PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
- Text/Formatted files: All word / excel / Power point files may be deleted once every year depending on the importance or lack of it.

Document Type: Doc – 3

Web page files

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.
