

IndusInd Bank Limited

Policy for Preservation of Documents

March 2023

1. BACKGROUND

The Securities and Exchange Board of India notified on September 2, 2015, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”), which became effective from December 1, 2015.

In terms of Regulation 9 of the SEBI Listing Regulations, the Bank is required to formulate and adopt a ‘Policy for Preservation of Documents’, duly approved by its Board of Directors.

The said Policy is required to be classified into the following two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years.

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

2. DEFINITIONS

- a) “Book of Accounts” includes records maintained in respect of
 - i) All sums of money received and expended by the Bank and matters in relation to which the receipts and expenditure take place;
 - ii) All sales and purchases of goods and services by the Bank
 - iii) The assets and liabilities of the Bank;
 - iv) The items of cost as may be prescribed under Section 148 of the Companies Act, 2013 as amended from time to time.
- b) “Documents: refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondence, challan or any other record required under or in order to comply with the requirements of any law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- c) “Electronic Form” means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Bank or otherwise the Bank has control over access to it.
- d) “Maintenance” means keeping documents, either physically or in Electronic Form.
- e) “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

3. PRESERVATION OF DOCUMENTS

The Bank shall preserve all documents in the manner and to the extent as prescribed under the relevant provisions of the Banking Regulations Act, 1949, the Companies Act, 2013 and the Relevant Rules made thereunder, the Secretarial Standards 1 relating to meetings as issued by the Institute of Company Secretaries of India (ICSI), the Secretarial Standards 2 relating to general meetings as issued by the ICSI, the SEBI Act, 1992 and the concerned Regulations and Guidelines issued thereunder and the Income Tax Act, 1961 and the Rules made thereunder, and any such other law, rules, regulations directions, guidelines as may be issued by the concerned statutory/ regulatory authority as amended, from time to time (extant norms).

In compliance with the requirements of the extant norms., the Bank's Record Maintenance and Retention Policy mandates preservation of Secretarial and Accounting records, in the manner as indicated in Annexure 'A' and Annexure 'B', respectively.

In addition to the above, the Bank shall ensure that the records are maintained in accordance with the relevant provisions of the Banking Companies (Period of Preservation of Records) Rules, 1985, as amended, from time to time.

4. MODE OF PRESERVATION

The Bank may preserve its records either in physical form and/ or in electronic form, and in the manner as prescribed under the extant norms, including but not limited to the Information Technology Act, 2000, and such other laws, rules and regulations, relating to maintenance of records, as amended, from time to time.

All records of the Bank shall be preserved in such formats and in such manner as may be prescribed under the extant norms, so as to ensure its confidentiality, with adequate access controls, and protection of physical records by storing the same in a secure premise, with adequate security, firefighting devices, etc.

In case the records maintained in electronic form is proposed to be transferred to another electronic system, the Bank shall ensure that all the records preserved in the old electronic system are transferred/ migrated to the new electronic system, to ensure that the records preserved in the old electronic system are accessible in the new electronic system.

5. DISPOSAL AND DESTRUCTION OF RECORDS

After expiry of the retention period as stipulated under this Policy, the preserved documents may be destroyed in such manner as may be permitted by the Bank, subject to the written approval of the concerned Head of Department.

Destruction of records of the Bank, (in physical or in electronic form), may be done, as a normal administrative practice, in respect of those records that are found to be duplicate /

unimportant / no longer required, subject to its confirmation in writing by the Head of Department.

Subject to the above, records of the Bank, may be destroyed, as follows:

- a. Recycle non-confidential paper records;
- b. Shredding or otherwise rendering unreadable confidential paper records; or
- c. Deleting or destroying electronically stored data.

The concerned department shall maintain a list of all records that are proposed to be destroyed, in the following format.

Particulars of document along with the relevant provisions of extant norms	Date and mode of destruction	Initials of the authorised person (CET Member or Concerned HOD)
1	2	3

6. RESPONSIBILITY

The respective CET Members/ BU Heads/ / Functional Heads of the Bank shall be responsible for maintenance, preservation and destroying of documents in respect of their respective area of operations, in terms of this Policy.

7. REVIEW AND AMENDMENTS TO THE POLICY

The Policy shall be reviewed once in three years or in case of change in regulations or to meet the business requirements of the Bank, whichever is earlier.

The Policy shall accordingly be due for review in March, 2026.

Company Secretary Department

**MINIMUM RETENTION PERIOD OF
DEPARTMENT RECORDS**

Under the Companies Act 2013

Activity	Description of Record	Retention Period (in years)	Location
<i>Registers etc.</i>	Register of Members commencing from the date of registration of the company	Permanent	Registrar & Share Transfer Agent Link Intime India Pvt. Ltd., C 101, 247 Park L. B. S. Marg, Vikhroli (West), Mumbai – 400 083
	Index of Members	Permanent	Registrar & Share Transfer Agent Link Intime India Pvt. Ltd., C 101, 247 Park L. B. S. Marg, Vikhroli (West), Mumbai – 400 083
	Register of Debenture holders (Bondholders)	Permanent	Corporate Office
	Index of Debenture holders (Bondholders)	Permanent	Corporate Office
	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	10 years from the date of filing with the Registrar.	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Share Transfer Register	10	Registrar & Share Transfer Agent Link Intime India Pvt. Ltd., C 101, 247 Park L. B. S. Marg, Vikhroli (West), Mumbai – 400 083

	Register of renewal and duplicate certificates	Permanent	Registrar & Share Transfer Agent Link Intime India Pvt. Ltd., C 101, 247 Park L. B. S. Marg, Vikhroli (West), Mumbai – 400 083
	Dividend Register and List of Unclaimed Dividends	Permanent	Registrar & Share Transfer Agent Link Intime India Pvt. Ltd., C 101, 247 Park L. B. S. Marg, Vikhroli (West), Mumbai – 400 083
	Register of Directors and Key Managerial Personnel	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Register of Directors and Key Managerial Personnel Shareholding	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Registers of Contracts and Arrangements in which directors are interested under Section 189	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Register of investment in securities not held in the name of the Bank		
	Register of Inter-corporate loans and investments		
<i>Minutes</i>	Minutes of all meetings of the Board	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Minutes of various Committees of Directors.	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Attendance Register of Board and Committees	At least ten financial years from the date of last entry made therein	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Office copies of Notices, Agenda, Notes on Agenda and Memorandum with annexure and other related papers	As long as they remain current or for ten financial years, whichever is later	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Minutes of General Meetings	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office

	Office copies of Notices, Scrutiniser's Report and related papers	As long as they remain current or for ten financial years, whichever is later	Secretarial & Investor Services cell - Solitaire Corporate Park Office
<i>Documents and Returns filed with various statutory authorities</i>	Documents filed with Stock Exchanges under Listing Agreement	10	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Documents filed with Stock Exchanges under various SEBI Regulations	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Documents filed with RoC / MCA	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Documents filed with NSDL / CDSL	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Annual Reports, Incorporation Certificate, Memorandum and Articles of Association, Common Seal	Permanent	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Investor meet presentations	8 Financial years	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Newspaper cutting of Notices of Board meeting and Financial Results	8 Financial Years	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Postal Ballot forms	8 Financial Years	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Correspondence with Shareholders	8 Financial Years	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	IEPF related forms and documents filed with MCA	8 Financial Years	Secretarial & Investor Services cell - Solitaire Corporate Park Office
	Reports on Performance Evaluation of the Board	8 Financial Years	Secretarial & Investor Services cell - Solitaire Corporate Park Office

Finance and Accounts Department

**MINIMUM RETENTION PERIOD OF
DEPARTMENT RECORDS**

Perm =Permanent

Activity	Description of Record	Retention Period (In years)	Location
<i>Accounting</i>	Consolidated General Ledger	Permanent	Corporate Office
	Consolidated Profit & Loss	Permanent	Corporate Office
	Consolidated GL Audit	Permanent	Corporate Office
	Consolidated Profit & Loss Audit	Permanent	Corporate Office
	Corporate Office Account Reconciliation Statements	2	Corporate Office
	Principal Account Reconciliation Statements	2	Corporate Office
	Inter Branch Accounts Reconciliation Statements/ Correspondence	2	Corporate Office
	Income Tax deductions & payment to Government-related records	11	Corporate Office
	Professional Tax deductions and payment to Government-related records	11	Corporate Office
	Service Tax remittance and related records	11	Corporate Office
	GST records	11	Corporate Office
	Engagement letters from Auditors		
<i>Regulatory Compliance</i>	CRR Returns and related computation Records	10	Corporate Office
	SLR Records and related computation Records	10	Corporate Office
	DOS Return Copies	10	Corporate Office
	DSB Return Copies	10	Corporate Office
	Form X Return Copies	10	Corporate Office
	BSA Return Copies	10	Corporate Office
	All other Return copies	10	Corporate Office
	RBI Circulars	Permanent	Corporate Office
	Calendar of Return copy	2	Corporate Office
Correspondence with RBI	10	Corporate Office	

<i>Balance Sheet and Profit & Loss</i>	Annual Balance Sheet (original approved copy)	Permanent	Corporate Office
	Annual Profit & Loss Account (original approved copy)	Permanent	Corporate Office
	Long Form Audit Reports	11	Corporate Office
	Statutory Audit Reports	11	Corporate Office
	RBI Audit Reports	11	Corporate Office
	Other Audit Correspondence	2	Corporate Office
	Records and Returns used as background papers for Balance Sheet and Profit & Loss Account	Permanent	Corporate Office
	Tax Audit Papers	11	Corporate Office
	Income Recognition and Asset Classification related papers, registers, etc.	10	Corporate Office
	Capital Adequacy computation related papers, registers, etc.	10	Corporate Office
	Accounting Policies related approved notes, correspondence, etc.	Permanent	Corporate Office
	Accounting Standards and General Ledger Accounting Lines related correspondence, etc.	Permanent	Corporate Office
<i>Balance Sheet and Profit & Loss</i>	Notes to the Board of directors and other Correspondence	Permanent	Corporate Office
<i>Returns & Audit</i>	Copies of Returns submitted to RBI and other Authorities	10	Corporate Office
	Copies of Audit Reports and related correspondence	5	Corporate Office
	Copies of Returns received from Branches, Consolidation Records and Returns submitted to RBI etc.	10	Corporate Office
	Statutory Audit Reports and follow-up	5	Corporate Office
	Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return		
	Documents, Challans and other details/correspondence related to Income Tax, Sales Tax/ VAT and Service tax		
<i>Branch operation</i>	Branch Correspondence	5	Corporate Office
	Permanent Instructions, Background Notes, Papers	Permanent	Corporate Office

	Tax deducted centrally		Corporate Office
<i>Budgeting and Performance Review</i>	Annual Budget	10	Corporate Office
	Period Performance Reviews	10	Corporate Office