



RBL BANK LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

(VERSION 1)

EFFECTIVE DATE – MAY 2, 2017

I. BACKGROUND

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") requires RBL Bank Limited ("the Bank") to frame a policy (upon Listing) on Preservation of Documents which has to be approved by the Board of Directors.

II. OBJECTIVE

The objective of the Policy is to classify the documents, records and registers of the Bank which are required:

- i) To be preserved permanently and
- ii) To be preserved for a period of not less than eight years after completion of the relevant transactions

III. SCOPE

This policy shall govern preservation of documents, records and registers of the Bank as per applicable statutory and regulatory requirements.

IV. PRESERVATION OF DOCUMENTS

The Bank shall preserve all its documents as per the requirements and provisions of the Banking Regulations Act, 1949 and rules & regulations made thereunder, Companies Act, 2013 and the rules & regulations made thereunder, Secretarial Standards issued by the Institute of Company Secretaries of India, Listing Regulations and any other law, rules, regulations as may be applicable to the Bank from time-to-time.

1. Documents to be preserved permanently:

- a. The Memorandum of Association and the Articles of Association of the Bank.
- b. Minutes of General Meetings, Board Meetings and its various Committee Meetings.
- c. Various Statutory Registers as required under the provisions of the Companies Act.
- d. Licenses and Statutory Approvals.
- e. Intellectual Property Documents.

- f. Property Records.
- g. Any other document as may be required to preserve permanently in terms of applicable law(s), preserved from time to time.

2. Documents to be preserved for atleast eight financial years (from the date of signing/execution/receipt/entry)

- a. Books of account together with the vouchers relevant to any entry in such books of account.
- b. Copies of All Annual Returns.
- c. Disclosure of Interest received from the Directors of the Bank in the manner prescribed.
- d. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings.
- e. Tax Records.
- f. Insurance Records.
- g. Business Contracts/ agreements.
- h. ROC Filings.
- i. Employment/Personnel Record in case of employees of the Bank.
- j. Relevant marketing/ sales documents and Press Releases.
- k. 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
- l. Any other document as may be required to preserve in terms of applicable law(s), preserved from time to time.

V. MODE OF PRESERVATION

The Bank shall preserve these records either in physical or electronic mode. The Applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be preserved as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

VI. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period the preserved documents may be destroyed in such a mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

VII. RESPONSIBILITY

The respective Departmental/Functional Heads of the Bank shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

VIII. REVIEW AND AMENDMENTS TO THE POLICY

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the Statutory Provisions and remains effective.

This Policy shall be reviewed periodically and may be amended by the Board of Directors of the Bank, as may be deemed necessary.