



Record Retention Policy

I. Purpose

The Record Retention Policy (the “**Policy**”) provides for the systematic review, retention, and destruction of records and documents received or created by IndoStar Capital Finance Limited [“**IndoStar**” or “**ICF**” or “**Company**”].

This Policy covers all records and documents, regardless of form – physical, electronic [including email] or any other, and contains guidelines for how long certain documents should be kept and how records should be reviewed and destroyed.

The Policy is designed to ensure compliance with requirements of laws, regulations, circulars and notifications applicable to the Company including RBI regulations, Securities and Exchange Board of India regulations, tax and company law, and to eliminate accidental destruction of records and to facilitate operations by promoting efficiency and freeing up valuable storage space.

II. Document Retention

IndoStar will follow the document retention procedures outlined below.

Documents that are not specifically listed, but are substantially similar to those listed, will be retained for the appropriate length of time. In case a similar record is also not listed below then the same shall be retained for such period as maybe prescribed under applicable laws, and in case no such period is prescribed, the same shall retained as per internal SoPs, if any, or permanently.

III. Description of Records and retention period

Documents / Records of the Company shall be retained for a period as mentioned below, unless laws applicable to the Company prescribe a stricter retention period:

Type of Document	Minimum retention requirement
(I) Corporate and Legal records	
Memorandum and Articles of Incorporation	Permanently
Board and Board Committee meeting agenda papers	Permanently
Board and Board Committee meeting minutes and resolutions	Permanently
Policies [including policies approved by the Board of Directors], Reports, Disclosures & related documents	Permanently
Copyright and Trademark Registrations	Permanently
Intellectual Property and Trade Secrets	Permanently. However, in case of sale / relinquishment of intellectual property / trade secrets, 10 years after expiry of year in which sold
Filings with Registrar of Companies	Permanently
RBI and other regulatory approvals	Permanently
Original corporate registrations, permits or licenses	Permanently
Original branch / office registrations, permits or licenses	10 years after expiry of year to which records pertain
Lease Deeds / Leave and License documents for premises or assets	10 years after expiry of the relevant lease deeds / leave and license agreement

Records of Capital or Debt / Debenture issuances, including Prospectus, Information Memorandum, Offer Document and related legal or tax opinions etc.	Permanently
RBI correspondence	Permanently
Legal files, including records of litigation for / against the company	10 years after expiry of year in which the relevant matter is settled / closed off
Loan Documents in respect loan granted by the Company	10 years after expiry of year in which loan is repaid
Anti-Money Laundering Records	10 years after expiry of year to which records pertain
Contracts	10 years after expiration of contract
Press releases and other public filings	10 years after expiry of year to which the press release or filings pertain

(II) Financial records	
Financial Statements	15 years after expiry of year to which the records pertain. Signed annual financial statements to be retained permanently
Signed Statutory Audit Reports	Permanently
Signed Internal Audit Reports	Permanently
Accounts Payable Ledgers and Schedules	15 years after expiry of year to which records pertain
Bank Statements and Reconciliation	15 years after expiry of year to which records pertain
Receipts for payments made or received	15 years after expiry of year to which records pertain
Depreciation Schedules	15 years after expiry of year to which records pertain
Electronic Fund Transfer Documents	15 years after expiry of year to which records pertain
Fixed Asset Records	15 years after expiry of year in which an asset is discarded / not kept in use
General Ledgers, Journal Entries, Accounting vouchers	15 years after expiry of year to which records pertain
Insurance Policies, Records, Accident Reports, Claims	15 years after expiry of year to which records pertain
Tax returns, filings, records and computation papers	Permanently
Invoices (to customers, from vendors)	15 years after expiry of year to which records pertain
RBI filings and related computations	Permanently
Agreements with banks and other lenders, including charge or security creation documents	15 years after expiry of year in which loan is repaid

(III) Human Resources records	
Compensation records	Permanent
Payroll Records, Registers and Summaries	Permanent
Personnel Files	8 years after expiry of year in which employee leaves
Appraisals	Permanent
Records Relating to Promotion, Demotion, Termination or Discharge	Permanent

(IV) Client records	
Know Your Customer [KYC] Documents	10 years after expiry of year in which loan was repaid
Correspondence (general)	10 years after expiry of year in which loan was repaid
Correspondence (legal and contractual matters - including credit memo's, loan agreements, documents relating to collateral and compliances)	10 years after expiry of year in which loan was repaid

IV. Document Destruction

Records which have met the required retention period may be destructed with prior approval of the Compliance Officer.

Document destruction will be suspended immediately, upon any indication of an official investigation or when litigation is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

V. Compliance and Review

Failure on the part of employees to follow this Policy can result in possible civil and criminal liability for the Company and its employees and possible disciplinary action against responsible individuals.

“Compliance Officer” is Mr. Jitendra Bhati or such other person as may be appointed in his place, from time to time, as Compliance Officer, by the Management Committee. The Compliance Officer of the Company will periodically review this Policy with the CFO and the internal or statutory auditors to ensure that the Policy is in compliance with new or revised regulations.
