



**RECORD MANAGEMENT AND PRESERVATION
POLICY**

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1. Objectives

The objective of the policy would be preservation of records in an efficient, secured and cost-effective manner so that identification, retrieval and disposal of records by branches/ offices of the Bank are facilitated to meet their operational, business, legal, statutory and policy/decision making requirements in pursuit of the Bank's mission.

Document management is the process of handling documents/records in such a way that documents/records can be created, shared, organized and stored efficiently and appropriately. Implementing a proper document management system is critical for banks. The onus of a document management system is on the organization. It should be ensured that the documents are stored in an organized and secured manner that allows documents to be retrieved easily.

2. Scope

The scope of the policy is to guide and implement standard procedure for record / document storage, retrieval and disposal of all documents including documents to be preserved as per statutory/ regulatory requirements as amended from time to time, to be followed in the organization by all branches and other offices. This is applicable to Bank's records/data including digital/electronic data or digitised form of records across all departments and offices serving the operational and functional efforts that collaboratively support the business operations. Data originated / owned by the Bank as well as data obtained from external sources will be under the scope of this Policy.

3. Applicability of the Statutory / Regulatory Guidelines:

Applicable Laws / Acts:

All the prevailing and related statutory guidelines are applicable to this Policy. While formulating the period of retention of any records, the governing statutory / regulatory guidelines have been taken care of. In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing rules of the Bank, the law, rule, regulation or standard will take precedence over this policy. Any change in the prescribed period of archiving in applicable law shall mutatis mutandis apply to this Policy.

While preserving the records, the requirements of the following Acts/ Statutes have taken into consideration to meet compliance of statutory and regulatory provisions, particularly those as stipulated in:

- Bankers Books Evidence Act, 1891
- Banking Regulations Act, 1949

- Banking Companies (Period of Preservation of Records) Rules, 1985
 - Information Technology Act, 2000
 - Prevention of Money Laundering Act, 2002
 - Regulation 9 of SEBI (Listing Obligation and Disclosures Requirements), Regulations 2015
 - IRDAI (Minimum Information Required for Investigation and Inspection) Regulations - 2020
- The brief instructions of the above statutory/ regulatory guidelines are incorporated in **Annexure-I**.

4. Key Terms and Definitions

“Applicable Law” means any Law, Rules, Circulars, Guidelines or Standards issued by the Central Government, Reserve Bank of India, Securities Exchange Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other statutory/regulatory authorities, in which the preservation of the Documents is prescribed, and are applicable to the Bank.

Data is a set of information, knowledge, facts, concepts, instructions or numbers, prepared or collected in a formalized manner or information in an electronic form that can be stored and used by a system.

Digital Data is data that is created using IT or computer applications and can be interpreted by other applications.

Data Retention is the process of continued storage of an organization's data for various compliance and business requirements for a specified period. It comprises of Active data and Archived data.

Data Archival: Archived data consists of older data that remains in the storage system, which can be used as and when needed. Archival ensures that the Active Data storage stays lean.

Data Purging or disposal is the method of erasure or deletion of data from the storage systems, which is no longer required. Purging deletes the data permanently and sets free the memory space or storage for other usage.

Document: A “document” is a paper or any other material thing offering information, proof or evidence of anything like Files, Vouchers, Registers, Ledgers, Manuals, Agreements, Paid Cheques, Drafts, Orders, Declarations, Forms, Books, Tapes, Floppies, CDs, DVDs, Electronic Storage Devices, etc. and the like as required to be maintained under any applicable law or regulation for the time being in force or in existence, maintained in physical or electronic form or both and does not include multiple or identical copies.

‘Listing Regulations’ shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘Listing Regulations’).

Preservation means to keep the records in good order, preventing from being altered, damaged or destroyed.

Record: A 'record' means any document or other source of information compiled, recorded or stored in written form or on film or by electronic process or in any other manner or by any other means. In other words, records can be defined as information created, received, and maintained as evidence and information by the bank, in pursuance of legal obligations or in the transaction of business.

Old Record: Records which are eligible to be shifted to the Record management vendor as per the existing guidelines.

5. Authority Responsible for Compliance with The Policy

All the employees of the Bank, permanent or others, consultants, vendors are responsible for preservation of the documents in their area of work/assignments and to retain/preserve or for destruction of documents pertaining to their area.

<u>Level</u>	<u>Authority Responsible For Compliance</u>
Board of Directors	Provide senior management with clear guidance and direction.
	Review the strategies and arrangements regularly vis a vis the market changes, Regulations environmental factors, new products activities and systems and if necessary, revise them in the light of the analysis.
	Lay down appropriate approval authorities depending on risk and materiality.
Operational Risk Management Committee (ORBMC)	Recommend the policy framework and evaluate the risk and materiality of all existing and prospective arrangements and recommending the same to the Board of Directors for adoption.
	Review the Implementation of Document handling, Digitisation of Records and Retention Policy management matters delegated to it by the Board.
	Reviewing the strategies & arrangements for their relevance and safety & soundness and making appropriate recommendations to RMCB/Board.
Departments	Evaluating the risks and materiality of all existing and prospective arrangements pertaining to their departments.
	Preparing list of activities pertaining to their department and formulation of the standard procedures to be adopted by branches and offices based on the materiality of the activity and policy framework.
	Implementing the policy prescriptions/reviewing periodically the effectiveness of strategies and arrangements. Notwithstanding anything contained in any other internal policies/guidelines, the roles and responsibilities related to record management and preservation shall prevail to the extent specifically mentioned in this policy.
Internal Audit / Compliance	Internal Audit Department during RBIA/Management Audit shall conduct audits independently for the compliance of the policy.
	Compliance Department shall ensure periodical Compliance testing as per the Compliance Policy guidelines on the effectiveness of implementation of Policy.

Zonal Office / Regional Office / RPCs/ Hubs/ Administrative Office etc.	Reviewing periodically the effectiveness of policies and procedures pertaining to activities covered in the respective office.
Branch Head	Branch Manager will have the overall responsibility for overseeing and monitoring of the implementation of the policy at Branch.
Chief Technology Officer	Chief Technology Officer (CTO) shall be responsible authority for the preservation of digital and electronic records.

6. Review of the Policy

One Year from the date of approval of this Policy. But in case of any amendment(s), clarification(s), circular(s), etc. issued by competent authorities of the bank on the basis of any amendments to the Laws & Rules of the Land, not being consistent with the provisions laid down in this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail over the provisions of this Policy and this Policy shall stand amended accordingly. The Board has the power to replace this Policy entirely with a new Policy. Any guidelines issued by any Regulatory Authority which has the effect of changing any of the provisions of this policy will also become part of the policy from the date of issuance of such guidelines.

7. Mode of Retention/ Preservation

The documents/records specified in Annexures to this Policy, shall be retained/ preserved, as the case may be, in

- Physical form (Hard Copy) and/or
- Electronic/ digital or digitised forms/scanned copy (Soft Copy)
- or in Both

a) The preservation of records/documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

b) The preserved records/documents must be accessible at all reasonable times. Access may be controlled by Authorized Officer, so as to ensure integrity of the records/documents and to prohibit unauthorized access.

8. Risk Assessment and Mitigation

Law does not afford any protection in respect of any negligence in the matter of preservation. The only protection available is in case of records destroyed by fire, inundation, flood, earthquake or any other

Act of God. Where such a circumstance comes about, a list has to be made in respect of the items that are missing and an endorsement has to be made on the register stating that the record item numbers are destroyed by fire, inundation, earthquake, etc. For this purpose, the policy of the bank on security arrangement to be followed to avoid any incidence of loss by fire/flood/inundation.

Further it has to be ensured that digital images are managed according to the Organization’s records management program and the digital images captured into a recordkeeping system where they can be ed only by authorised users, secure from alteration or deletion, in context with related records, protected from disaster and kept for their required retention periods. It has to be ensured that all the master images are not stored on removable media where they can be at risk and their duplicates are managed as per the record management programme.

9. Reduction of risk associated with fire and water

Records are prone to risk of fire hazards and flood. Proper and adequate measures must be in place wherever the Records are stored/preserved/retained, to prevent any incidence of fire and flood. For this purpose, the Circular/ Guidelines issued by the Risk Department should be followed in its true spirit to avoid any incidence of fire and in the situation of flood.

There has to be a properly identified and approved place of storage to keep all old records of the branch safely. Wherever centralized storage arrangement can be made, such place should be convenient and easily accessible to all the branches/offices in that particular place. Care should be taken that selected place is a well secured, top grade constructed, with adequate safeguards against fire, termites, white ants, seepage, etc.

10. Category of Documents and Their Retention Period

To bring more clarity, records /documents need to be categorized in different bucket of retention period in alignment with the provisions contained in various statutory /regulatory guidelines, nature of documents and operational /legal /administrative requirements etc. It will also provide better understanding and convenience to operating staff / Departments /branches /offices while defining retention period for records pertaining to their area of operations.

Category (A)	Types of Record	Retention Period
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A	Records related to Policy matters, strategic/ historical importance, operating instructions or any other document important from legal / statutory / administrative point of view. (e.g. General Meeting, Minutes, Board and Committee, Meeting Minutes, Statutory Registers, MOA and AOA,, e-Circulars, General Ledger, Branch License, In-operative/ DEAF Account etc.)	Permanent (Annexure-II)
B	Records where customers/ third party transactions are recorded which will permit reconstruction of individual transactions.	10 Years from the date of transaction /Date of payment / closure of the account as applicable. (Annexure- III) <u>(Explanation with exceptions detailed below)</u>
Category	<u>Explanation with exceptions</u>	
(B)	<p>1) 10 Years from the date of transaction in respect of transaction details of Savings Bank/ Current / Cash Credit/ Overdraft Accounts except inoperative /DEAF accounts which are to be retained permanently. However, once inoperative account becomes active account, normal retention period will be applicable. The original vouchers for such transfers are required to be retained till the claims are settled even after transfer to DEAF.</p> <p>2) In case of Term Deposits, Term Loans and Housing Loan Account or any other schematic loan as overdraft facility, the transaction details to be preserved for a period of 10 Years from the date of closure of the account respectively.</p> <p>3) Other related Registers/ records when maintained in physical form contain records related to multiple accounts. Hence, in the case of advances, registers should be preserved for 10 Years from the date of closure of last outstanding account, in the case of deposit transactions, from the date of last operation in the outstanding account and in case any other registers from the last entry in the register.</p> <p>4) In case of electronic /digital form of records /registers the retention period will be reckoned from the date of transactions.</p>	
C	Records pertaining to the identification and address of the customers /third parties obtained in the course of	10 Years from the date of cessation of business relationship

<p>transaction. (e.g. Account Opening forms, KYC/FATCA and CRS related documents/ Non-financial transactions (viz. change in KYC details, phone number, address etc.) related records of customer/ beneficial owner/ third parties including digital records, KYC documents pertaining to account opened through non face to face by means of Video Customer Identification Process (VCIP) and records of the identity of customer/beneficial owner which include updated records of the identification data, account files, business correspondence and result of any analysis undertaken under rule 3 (Maintenance of Records of Transactions) and rule 9 (Client Due Diligence) of PML (Maintenance of Records) Rules, 2005.</p>	<p>between the Bank and the client. (Annexure- III)</p>
<p>(In terms of RBI Master Circular on KYC/AML/CFT dated 01-07-2015 “Transaction” means a purchase, sale, loan, pledge, gift, transfer, delivery or the arrangement thereof and includes-</p> <ul style="list-style-type: none"> (i) opening of an account; (ii) deposits, 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) the use of a safety deposit box or any other form of safe deposit; (iv) entering into any fiduciary relationship; (v) any payment made or received in whole or in part of any contractual or other legal obligation; or (vi) establishing or creating a legal person or legal arrangement) <p>Above Categories (B) and (C) are in line with PML Act & Rules and RBI Master Circular on KYC/AML/CFT dated 01- 07-2015. As per regulatory guidelines, retention period is 5 Years for the above-mentioned records. However, for the operational convenience and also in compliance of Banking Companies (period of preservation of records) Rules 1985 and Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements) which prescribes retention period of 05/08 Years, uniform retention period of 10 Years have been maintained for both the category.</p>	

D	<p>Records related to litigation/ disputes/ court cases/ fraud cases/ investigations (internal or external) / files related to staff disciplinary actions and written off loan accounts, the related papers, files register etc. (For Example: List of some of such records are as below: 1) Where suits have been filed/ legal action is pending. 2) Records where staff accountability has to be ascertained. 3) Records relating to frauds/ police enquiries/ other investigations are pending. 4) Income Tax attachment orders including sealing of SDV lockers. 5) Where Insurance claim made by the Bank are pending unsettled.)</p>	<p>10 Years from the date of final settlement/ closure of loan account, as the case may be. (Annexure- III)</p>
E	<p>Records to be preserved for longer period due to administrative/ legal importance attached with the documents. (e.g. Title Deed /EM Register, Fixed Assets Register, Leave Register, Safe Deposit Locker Key Register, Legal Opinions etc.)</p>	<p>More than 10 Years (Annexure-IV)</p>
F	<p>Records for which preservation period is not prescribed by statute. Records and Registers where transactions are internal in nature and not included in any other Category as defined above.</p>	<p>Less than 10 Years (Annexure- V)</p>

11.Preservation of Documents

Bank may on board vendor(s) for warehousing and preserving the records and documents of the Bank in due compliance with the applicable policies and processes approved by the Bank. Old records shall be shifted to the Record Management vendor as per the existing guidelines.

The substantial increase in the volume of transactions, and consequently, in the related documents has led to onboarding of Vendor to store the records. The vendor shall pick up documents, vouchers and reports from the respective bank branch, office or any other locations/premises of Bank's business partners/vendors where Bank's documents/records are kept and preserve them in their location for an agreed period. In case of requirement, these records shall be retrieved through the vendor.

Retention period prescribed hereunder for other than 'permanent' category is minimum period of retention. Depts/branches /offices may consider preserving the record for longer retention period depending upon operational/legal requirements.

The concerned department of the Bank in compliance with the Policy/laws prevailing in force, shall provide the term for which a record or document shall be preserved with clear instructions on Inventory listing/ indexed field etc. for handing over the records or documents to the vendor for preservation. The ownership and responsibility for specifying the appropriate term for preservation of a document/record of the Bank shall be as per this Policy.

11.1 Preservation of Security Items:

Utmost importance has to be attached for safekeeping of security items as branches carryout a large number of financial transactions of huge value every day. It has to be ensured always that security items through which financial transactions are carried out are not put into the hands of fraudulent elements to avoid any financial loss either to Bank or to customers, putting into stake bank's reputation. The detailed procedures for handling of various security items have been laid down in respective Manuals of Instructions.

For the sake of convenience and also the risk attached to each item, the security items with reference to their place of storage are grouped as under:

Group A : Items to be necessarily held in FBR Strong Room/FBR Safe.

Group B : Items to be held preferably either in FBR/Strong Room/FBR Safe or in Fire Resistant Record Cabinet (which basically has a dual locking Arrangement).

The illustrative list of security items with reference to their place of storage as per the above grouping is furnished as Appendix-VIII.

12. Retrieval of Records

The Service Provider shall retrieve and deliver the requested cartons, files, vouchers, ledgers, registers and any other documents within specified TAT upon receipt of a written request in the form of e-mails or letters from the authorized officials of the bank. Retrieval shall mean delivery to the bank's premises at different locations.

The Service Provider will retain and maintain the records as per Record Management and preservation Policy of the bank which shall be provided by the bank.

The bank should have in place a management structure to monitor and control this outsourcing activities. It should ensure that outsourcing agreements with the service provider contain provisions to address their monitoring and control of outsourced activities.

Regular audits by either the internal auditors or external auditors of the bank should assess the adequacy of the risk management practices adopted in managing the outsourcing arrangement, the Bank's compliance with its risk management framework and the requirements of these guidelines.

The owner department should at least on an annual basis, review the financial and operational condition of the service provider to assess its ability to continue to meet its outsourcing obligations. Such due diligence reviews, which can be based on all available information about the service provider should highlight any deterioration or breach in performance standards confidentiality and security, and in business continuity preparedness.

The review of the vendor shall be conducted as per the Outsourcing & Vendor Risk Management Policy of the bank.

Only authorized Officers shall have the access to retrieve the records related to his/ her work area. Access to records shall be restricted based on the nature of records, accessibility, confidentiality of records etc. Officials shall only be able to view and not be able to edit or save the records. Admin users shall be able to save and share the digital records. While saving the records, each record shall be watermarked with staff number of the user, date & time of retrieval of records. A user access log shall be maintained for accessing and sharing the records. Branch/ offices, requiring e- records for perusal, have to quote the unique record identifiers for retrieval of records.

In all cases, where records are to be taken possession by the Police/ Governmental authorities, a written requisition has to be taken and an acknowledgement obtained from the recipient in respect of particular record to be taken possession of or delivered to, retaining copies of the records delivered.

13. Preservation of Counterfeit Notes Received from Police Authorities

All Counterfeit Notes received by the Bank from the police authorities/courts may be carefully preserved in the safe custody of the Bank and a record thereof be maintained by the branch. Forged Note Vigilance Cell of the Bank shall also maintain a branch wise consolidated record of such Counterfeit Notes. They should be preserved for a period of three (3) years from the date of receipt from the police authorities. Counterfeit Notes, which are the subject matter of litigation in the court of law should be preserved with the branch concerned for three years after conclusion of the court case. The manner of preservation of counterfeit notes and records maintained therein shall be as per the relevant guidelines issued in this regard by the concerned department from time to time.

14. Disposal of Records

Books, registers, slips, debit cards, PIN, PGKs, Cheque Books and other records that are not required to be preserved as per existing guidelines may be disposed of.

The above items should be shredded into pieces in the presence of two officers, one of them shall be Branch Head/ Officer In-charge and shall be certified as such by them in the "Register of documents destroyed" after their period of retention/preservation.

Asset Management Policy and Information Security Policy shall be referred and adhered to for retention and disposal of IT Assets. Post disposal of the asset; the vendor shall provision a certificate of secure disposal.

Provisions for exception/ ratification procedure and its delegation

Documents/records for which no specific retention period is prescribed have to be preserved taking into account the risk factors attached to each item or the probability of requirement of such records at a future date. Branches/offices to take up specific issues with concerned Department for guidance.

15. Types of Digital Data/ Digitised Records

Data in Bank's ecosystems are broadly classified as under:

Sl. No.	Data Types
i.	Application Data
ii.	Logs / Audit Trails
iii.	Business-related Customer & Transaction Data
iv.	Voice Recording
v.	CCTV Footage
vi.	Electronic Mail (E-mail)
vii.	Biometric Data
viii.	Digitized Records
ix.	Born-digital records
x.	Reports / Dashboards / MIS etc.
xi.	Miscellaneous Data not covered in above categories

- i. Application Data:** It includes Application Binaries, Operating System, Virtual Machines, Database and related data that constitutes the application supporting a functionality or the Business Process. It also includes configuration files related to the components of the Application set-up, Parameter files etc.
- ii. Logs / Audit Trails:** It consists of chronological record of events like user login, file access, other various activities to indicate what action was attempted, who performed the action, when it was performed and if it was successful or unsuccessful. It also includes activities such as updates and patching to determine when a system component fails or is incorrectly configured e.g. Logs related to Operating System, Database, Applications, Middleware,

Virtual Machine, Server, Network Devices Tools etc.

For entities handling card holder data , the PCI requires that audit logs be retained for at least one year and with a minimum of 3 months immediately available for analysis.

iii. Business-related Customer & Transaction Data:

This includes Business Data & Insights related to Customer and Transaction such as:

- a. Digital and digitized Data or insights pertaining to customer like personal details (Name, DOB, address, Mobile Number, Email IDs, any PII data, etc.)
- b. Data related to Customer's Account (Product, Term, Rate of Interest, etc.)
- c. Financial or non-financial or both data/details of transactions such as debits / credits in those accounts.

iv. Voice Recording: Voice recording through devices with recording features over the phone, device (e.g. Customer Contact Centre, Dealing Room Operations etc.) or via an online-meeting application (e.g. MS Teams/Webex etc.).

v. CCTV Footage: Closed-Circuit Television (CCTV) is a system that records video/audio footage installed in the Branches, Offices, Establishments, ATMs, Data Centres etc. as part of security, surveillance and monitoring of access controls etc. Video Footage is also referred to by various internal and external agencies such as regulator, security agencies, auditors etc.

Regarding the recording facility, 180 days recording shall be enabled for all locations where there is locker facility as per the RBI guidelines and for remaining branches it shall be not less than 90 days recording.

vi. Electronic Mail (E-mail): In today's time E-mail is the fastest and most convenient mode of transmission for messages or information and effectively it is the same thing as sending a memo or a letter in "hard copy". As such, electronic mail can be an official record of the Bank. Electronic mail systems are not designed as recordkeeping systems. This means that management of electronic mail is not part of the system design, rather e-mail needs to be managed by understanding what types of records are created using e-mail communication systems.

vii. Biometric Data: Fingerprints or any other similar bio-identifiers, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifiers used to

identify an individual. It is the personal information stored by Bank about an individual's (e.g. employees, customers, vendor resource etc.) physical characteristics that can be used to identify that person.

The purpose of collecting or obtaining such biometric data and usage shall be defined by the respective Data Owner, who shall specify the period of retention and purging or deletion frequency in the event of ceasing of relationship with the individual concerned like retirement/termination/transfer of employee, end of relationship with the customer, end of contract with the vendor etc.

- viii. Digitised Record:** is the digital representation of record, converted from physical or analogue records through scanning or imaging such records.
- ix. Born-digital records** are records that have been natively created in digital format (rather than digitized from paper records). Examples of born-digital information include i.e. email, text-based documents (for example Word documents, Google documents), presentations (for example PowerPoint), spreadsheets (for example Excel), PDFs etc.
- x. Reports / Dashboards / MIS:** Departments prepare reports (Regulatory, MIS), dashboards etc. keeping in view various business requirements in consultation with the respective Report Owners (The Business Units on whose behalf such Reports / Dashboards have been prepared).
- xi. Miscellaneous Data:** Data which is not mapped with any specific data type as mentioned above or any new data category which may come up in the future.

16. Digitization of physical records/documents:

Certain documents like KYC/Photo/ Signature, AOFs, loan documents etc., are now being scanned on a regular basis for which guidelines have been separately issued by the bank. The bank may also specify the scanned image type for digitization. Consideration must be given to the ability of a particular scanned image type to be searched. "Scanned image" types include: png (portable network graphics); jpeg (joint photographic experts' group); or searchable PDF for Archival (PDF/A) format. Scanning shall include indexing/meta data generation / storing and uploading to the software. Bank may also specify whether the scanning process will be done in- house or will be outsourced.

At least two copies of the e-records should be retained at different locations. Encrypt the private or confidential records which can be decrypted only by the authorized personnel. For the records that are

having evidentiary value, corresponding digital records should be hashed and the list of such hash values are to be maintained separately.

The documents identified for scanning may be old, delicate, fragile and brittle. Hence, sophisticated handling techniques may be required and hence high-quality fast scanners may be deployed. Scanning shall be done on-site in the respective branch/offices. The data scanned shall be stored in the Bank server/other locations and could be shared/retrieved at any time as decided by the bank.

Validation: Throughout the digitization process, the scanned images must be validated to ensure that a clean, readable image has been produced and that the metadata attached is accurate.

Retrieval of records: Branch/ offices, requiring e- records for perusal, have to quote the unique record identifiers for retrieval of records. Only authorised Officers shall be able/shall have access to retrieve the old records.

Destruction of Digital records: The Bank must retain, dispose e-records duly complying with the retention period stipulation for each underlying physical record and must apply additional considerations to ensure compliance to legal / regulatory guidelines in this regard specifically applicable for e-records / digitized records. Those policy guidelines for destruction of physical records shall be taken into account as applicable while destroying the corresponding digital records as well.

Our Bank has a number of electronic records in operation. The record maintained in the electronic form which include emails, web content, document images etc shall be part of the IT Policy and under the control of Chief Technology Officer (CTO) who is mandated to ensure proper maintenance of records and compliance, and put in place a detailed SOP to specify procedures for secure storage, access controls, periodic reviews, and compliance verification of digital and electronic records.

17.Training & Development

Learning & Development Department shall conduct regular training on the guidelines and processes of Record management. These trainings shall ensure that all staff members are aware of the record management policies and shall conduct or arrange such training as is necessary for the staff to equip them for their record management duties.

18. Category wise list of records are given in the Annexures as below

Sr. No.	Description	Annexure
1	Brief Instructions of Statutory / Regulatory Guidelines:	ANNEXURE- I
2	Common Records to be Retained Permanently	ANNEXURE- II
3	Records with Retention Period of 10 Years	ANNEXURE- III
4	Records with Retention period of More than 10 Years	ANNEXURE- IV
5	Records with retention period of Less than 10 Years.	ANNEXURE- V
6	Records related to HR	ANNEXURE- VI
7	Secretarial and Board Related Matters in Digital Form	ANNEXURE- VII
8	Unique Record Identifiers	ANNEXURE- VIII
9	Illustrative List of Security Items with Reference to Their Place Of Storage	ANNEXURE- IX

ANNEXURE- I

Brief Instructions of Statutory / Regulatory Guidelines:

(A) Provisions under Bankers Books Evidence Act, 1891:

“Bankers’ books” include ledgers, day-books, cash-books, account-books and all other books used in the ordinary business of a bank. Subject to the provisions of this Act, a certified copy of any entry in a banker’s book shall in all legal proceedings be received as prima facie evidence of the existence of such entry, and shall be admitted as evidence of the matters, transactions and accounts therein recorded in every case where, and to the same extent as, the original entry itself is now by law admissible, but not further or otherwise.

(B) Banking Regulations Act, 1949:

Preservation of records by banks for a prescribed period is a statutory requirement also. Section 37 of the Banking Laws (Amendment) Act 1983 has incorporated a Section 45Y in the Banking Regulation Act, 1949 which provides that the Central Government may after consultation with the RBI by notification in the Official Gazette, make rules specifying the period for which –

- a. A banking company shall preserve its books, accounts and other documents, and
- b. A banking company shall preserve and keep with itself different instruments paid by it.

(C) Banking Companies (Period of Preservation of Records) Rules, 1985:

- (i) Every Banking Company shall preserve in good order, its books, accounts and other documents like Cheque Book Registers, Vault Registers, relating to a period of not less than five Years immediately preceding the current calendar Year.
- (ii) Every Banking Company shall preserve in good order, its books, accounts and other documents like All personal ledgers, Loans and Advance Registers and Ledgers, Fixed Deposit Registers or Ledgers, Drawing Power Registers, Stock Registers of Goods Pledged, Equitable Mortgage Registers, Paid Cheques, Pay-in-slips etc., relating a period not less than eight Years immediately preceding the current calendar Year.

- (iii) Notwithstanding anything contained in rules as stated above, the Reserve Bank may, having regard to factors specified in sub-section (1) of section 35A, by an order in writing, direct any banking company to preserve any of the books, accounts or other documents mentioned in those rules, for a period longer than the period specified for their preservation, in the said rule.

(D) Information Technology Act, 2000:

a. Retention of electronic records:

(1) Where any law provides that documents, records or information shall be retained for any specific period, then, that requirement shall be deemed to have been satisfied if such documents, records or information are retained in the electronic form, if—

- (i) the information contained therein remains accessible so as to be usable for a subsequent reference;
- (ii) the electronic record is retained in the format in which it was originally generated, sent or received or in a format which can be demonstrated to represent accurately the information originally generated, sent or received;
- (iii) the details which will facilitate the identification of the origin, destination, date and time of dispatch or receipt of such electronic record are available in the electronic record:

Provided that this clause does not apply to any information which is automatically generated solely for the purpose of enabling an electronic record to be dispatched or received.

(2) Nothing in this section shall apply to any law that expressly provides for the retention of documents, records or information in the form of electronic records.

b. Guidelines for retention of Logs:

In terms of Government of India, Ministry of Electronics and Information Technology (MeitY) CERT-In Directions under sub-section (6) of section 70B of the Information Technology Act, 2000 relating to information security practices, procedure, prevention, response and reporting of cyber incidents for Safe & Trusted Internet dated 28.04.2022, the guidelines for retention of logs is as below.

Retention of Logs:

The policy specifically pertains to the management and retention of documents and electronic records from an operational perspective, particularly within the banking environment. The retention of system data, email, logs, or operating system-related

information shall be as per IT Policy of the Bank. As per CERT-In and RBI guidelines, all system logs, application logs, security device logs and access control logs must be retained for 180 days in a secure and tamper proof manner and should be available for any forensic audit. These should be provided to CERT-In along with reporting of any incident or when ordered / directed by CERT-In.

Exception handling: Where any decision or proposition with respect to digital/digitized data maintenance, results in retention schedules not being in conformity with the schedule defined in this Policy, the same shall be approved by the concerned Department Head.

- The Data Custodian / Department shall record the justification to modify any data category or retention schedule and document and maintain the same along with the required approval and advised to respective Data Owner.
- Change in category of a Data, thereby resulting in a change in the retention schedule shall also require approval.

(E) Prevention of Money Laundering Act,2002 and Prevention of Money Laundering (Maintenance of Records), Rules 2005: (Reference: RBI Master Circular No. RBI/2015-16/42 dated 01.07.2015)

As per the RBI directives in connection with the obligations of the banks relating to preservation of records as per the provisions of PMLA, banks are advised to take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

1. Maintenance of records of transactions (nature and value):

Banks/FIs should introduce a system of maintaining proper record of transactions prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005 (PML Rules, 2005), as mentioned below:

- (i) All cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency;
- (ii) Series of all cash transactions individually valued below Rupees Ten Lakh, or its equivalent in foreign currency which are that have taken place within a

month and the monthly aggregate which exceeds rupees ten lakhs or its equivalent in foreign currency. It is clarified that for determining 'integrally connected transactions' 'all accounts of the same customer' should be taken into account.

(iii) All transactions involving receipts by non-profit organisations of value more than rupees ten lakh or its equivalent in foreign currency.

(iv) 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 transaction and

(v) All suspicious transactions, whether or not in cash, made as mentioned in the Rules.

Banks/FIs are required to maintain all necessary information in respect of transactions prescribed under PML Rule 3 so as to permit reconstruction of individual transaction, including 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

2. Preservation of Records:

Administration- Infrastructure-Procurement (AIP) Department shall on board vendor(s) for warehousing and preserving the records and documents of the Bank in due compliance with the applicable policies and processes approved by the Bank. The concerned department of the Bank in compliance with the Policy/laws prevailing in force, shall provide the term for which a record or document shall be preserved to AIP with clear instructions on Inventory listing/ indexed field etc. while handing over the records or documents to AIP for preservation. The ownership for specifying the appropriate term for preservation of a document of the Bank lies with the concerned department which owns the record or document.

The substantial increase in the volume of transactions, and consequently, in the related documents has led to onboarding of Vendor to store the records. The vendor shall pick up documents, vouchers and reports from the respective bank branch, office or any other locations/premises of Bank's business partners/vendors where Bank's documents/records are kept and preserve them in their location for an agreed period. In

case of requirement, these records shall be retrieved through the vendor.

Banks/FIs should take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

(i) In terms of PML Amendment Act 2012, Banks/FIs should maintain for at least five Years from the date of transaction between the bank/FI and the client, all necessary records of transactions, both domestic or international, which will permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.

(ii) Banks/FIs should ensure that records pertaining to the identification of the customers and their 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 five Years after the business relationship is ended as required under Rule 10 of the Rules *ibid*. The identification of records and transaction data should be made available to the competent authorities upon request.

(iii) Banks/FIs may maintain records of the identity of their clients, and records in respect of transactions referred to in PML Rule 3 in hard or soft format.

(iv) Banks/FIs are required to pay special attention to all complex, unusual large transactions and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose. It is further clarified that the background including all documents/office records/memorandums pertaining to such transactions and purpose thereof should, as far as possible, be examined and the findings at branch as well as Principal Officer level should be properly recorded. Such records and related documents should be made available to help auditors to scrutinize the transactions and also to Reserve Bank/ other relevant authorities. These records are required to be preserved for five Years as is required under PMLA, 2002.

(v) Financial transaction records must be retained for a minimum of 10 years to support compliance, audit and investigations.

(vi) In terms of the amendment to Prevention of Money Laundering (Maintenance of Records) Rules, 2005 vide gazette notification No. SO1074(E) dated 07.03.2023 by the

Ministry of Finance, Department of Revenue, Government of India under sub-rule 9(9A) which is read as under.

(vii) “Every Banking Company or Financial Institution or intermediary, as the case may be, shall register the details of a client, in case of a client being a non-profit organization, on the DARPAN Portal of NITI Aayog, if not already registered, and maintain such registration records for a period of five years after the business relationship between a client and a reporting entity has ended or the account has been closed, whichever is later”.

(viii) Rule No.10 of Prevention of Money Laundering (Maintenance of Records), Rules 2005 (Maintenance of the records of the identity of clients) which is amended vide gazette notification No. G.S.R 652(E) dated 04.09.2023 by the Ministry of Finance, Department of Revenue, Government of India. The amended Rule 10 provides as under.

(1) Every reporting entity shall maintain the physical copy of records of the identity of its clients obtained in accordance with rule 9, after filing the electronic copy of such records with the Central KYC Records Registry.

(2) The records of the identity of clients shall be maintained by a reporting entity in the manner as may be specified by the Regulator from time to time.

(3) Where the reporting entity does not have records of the identity of its existing clients, it shall obtain the records within the period specified by the regulator, failing which the reporting entity shall close the account of the clients after giving due notice to the client.

Explanation. - For the purpose of this rule, the expression "records of the identity of clients" shall include updated records of the identification data, account files, business correspondence and result of any analysis undertaken under rule 3 and rule 9”.

3. Key Considerations

The Bank should 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 five years after the business relationship is ended as required under Rule 10 of the Rules. The identification records and transaction data should be made available to the competent authorities upon request or visible lawful purpose. It is further clarified that the background including all documents/office records/memorandums pertaining to such transactions and purpose thereof should, as far as possible, be amended and the findings at branch as well as Principal Officer level should be properly recorded. Such records and related documents should be made available to help auditors in their day-to-day

work relating to scrutiny of transactions and also to the Reserve Bank of India and/or other relevant authorities.

(F) Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements)

Regulation 2015:

The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows: -

- i) Documents whose preservation shall be permanent in nature.
- ii) Documents with preservation period of not less than eight Years after completion of relevant transactions:

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

(G) IRDAI (Minimum Information Required for Investigation and Inspection)

Regulations-2020:

All the records relating to KYC/ other records of client, details of complaints received from customers, details of Specified Persons i.e. CIFs / SPs etc., shall be maintained by sourcing Branch / Unit for a minimum period of 10 years from the date of last transaction on the respective records, or from the date of expiry of the policy, whichever is later.

(H) Master Circular on Detection and Impounding of Counterfeit Notes circulated

vide Circular notification No. RBI/2022-23/07 dated 1st April 2022:

- i) Counterfeit Notes received back from the police authorities / courts shall be carefully preserved in the safe custody of the bank and a record thereof be maintained by the branch concerned. FNV Cell of the bank shall also maintain a branch wise consolidated record of such Counterfeit Notes.
- ii) Counterfeit Notes at branches shall be preserved for a period of three Years from the date of receipt from the police authorities.
- iii) Counterfeit Notes, which are the subject matter of litigation in the court of law shall be preserved with the branch concerned for three Years after conclusion of the court case.

ANNEXURE- II

COMMON RECORDS TO BE RETAINED PERMANENTLY:

Sr. No	Description of Records	Retention Period to start from:	No of Years
1	General Ledger	NA	Permanent
2	All data leading to recording of entries in books of accounts	NA	Permanent
3	Licenses	NA	Permanent
4	Details of Unclaimed Account	NA	Permanent
5	Licenses, Sanctions from RBI and other regulatory Authority if it is in Digital Form	NA	Permanent
6	Source codes creating EXEs	NA	Permanent
7	Policy related matters in regard to Union / Association, Welfare, Court cases, Circulars, Guidelines etc.	The date of report	Permanent
8	Title Deeds of Properties owned by the Bank and Lease Deeds including Plans/ Drawings/ Sketches approved by various Statutory Organizations Review Reports. All correspondences/ books/ records, which come under the purview of the Central Vigilance Commission in connection with the enquiries instituted/ contemplated by Central Bureau of Investigation (CBI) or any other agency	The date of report	Permanent
9	Court Cases/ Arbitration related to premises matters	The date of report	Permanent
10	Minutes Book of Directors and Shareholders meetings.	The date of report	Permanent
11	Return of Annual List of members and summary of Capital	The date of report	Permanent
12	Directors' approval book	The date of report	Permanent
13	Dividend warrants register	The date of report	Permanent
14	Transfer deed files	The date of report	Permanent
15	Counterfoils of share certificates	The date of report	Permanent
16	Shares lying in register	The date of report	Permanent
17	Renewals, sub-division, duplicates and consolidated register	The date of report	Permanent
18	Share application forms	The date of report	Permanent
19	Provident Fund registers	The date of report	Permanent

20	Provident Fund Loan ledgers	The date of report	Permanent
21	Provident Fund General Ledgers	The date of report	Permanent
22	Provident Fund Day book	The date of report	Permanent
23	Provident Fund investment register	The date of report	Permanent
24	Trustees' minute books	The date of report	Permanent
25	Staff Security registers	The date of report	Permanent
26	Staff Service records book	The date of report	Permanent
27	Salary Summary	The date of report	Permanent
28	Staff File index book (Permanent but with the concerned department until new one is prepared).	The date of report	Permanent
29	Key Movement register	The date of report	Permanent
30	Powers of attorney, succession certificates, death certificate, etc. register.	The date of report	Permanent
31	Records relating to transactions which are in dispute	The date of report	Permanent
32	Premises and properties files and records	The date of report	Permanent
33	Loans, cash credits, overdraft registers which contain particulars of title deeds relating to accounts which are in force	The date of report	Permanent
34	Powers-of-attorney (current and saving bank)	The date of report	Permanent
35	Current and Saving Bank account opening forms	The date of report	Permanent
36	Leave record register	The date of report	Permanent
37	Memorandum of letters of lockers and specimen signature cards	The date of report	Permanent
38	Locker Number register	The date of report	Permanent
39	General Ledger	The date of report	Permanent
40	Specimen signature files or books	The date of report	Permanent
41	Confidential Files	The date of report	Permanent
42	Head Office circulars	The date of report	Permanent
43	Claims Files	The date of report	Permanent
44	Sundry Assets files	The date of report	Permanent
45	Register of unclaimed deposits	The date of report	Permanent
46	Annual Audit Reports and Financial Statements	The date of report	Permanent
47	Tax Exemption and Related documents	The date of report	Permanent
48	Tax Bills, receipts and payments	The date of report	Permanent
49	Court Orders	The date of report	Permanent

50	Original Purchase and Sale Agreement	The date of report	Permanent
51	Property Card, Index II, ownership records issued by Government Authority	The date of report	Permanent
52	Property Insurance	The date of report	Permanent
53	Payroll Registers	The date of report	Permanent
54	Bonus, Gratuity and other Statutory Record	The date of report	Permanent

Sr. No	Description of Records	Retention Period to start from:	No of Years
1	Day Book	The date of report	Permanent
2	Subsidiary ledgers	The date of report	Permanent
3	Overdraft registers	The date of report	Permanent
4	Loans, advances and cash credit registers	The date of report	Permanent
5	Sundries register	The date of report	Permanent
6	General accounts	The date of report	Permanent
7	Sundry assets	The date of report	Permanent
8	Sales and purchase contract records (investment on behalf of clients)	The date of report	Permanent
9	Register showing collection of dividends and interest on securities on behalf of constituents	The date of report	Permanent
10	Salary book	The date of report	Permanent
11	Register of shares received	The date of report	Permanent
12	Shares lodged for transfer book	The date of report	Permanent
13	Summary of guarantees and indemnity liabilities	The date of report	Permanent
14	Import letters of credit advices	The date of report	Permanent
15	Letters of credit ledgers	The date of report	Permanent
16	Loans against documents (Loans against merchandise and trust receipts)	The date of report	Permanent
17	Counter indemnities - Re. Letters of guarantees	The date of report	Permanent
18	Trust receipt certificates	The date of report	Permanent
19	Safe-in Safe-out registers (Securities kept in, taken out)	The date of report	Permanent
20	Current, Savings, Cash Certificates, Fixed, Short term, Special Term, Call Deposit registers	The date of report	Permanent
21	Drafts, TTs and MTs paid and payable registers	The date of report	Permanent
22	Drafts, TTs and MTs issued registers	The date of report	Permanent

23	Accounts with other banks	The date of report	Permanent
24	Lien registers (Permanent till lien is in force) 25. Drawing Power Register.	The date of report	Permanent
25	Government Securities lodged with different banks	The date of report	Permanent
26	Bills purchased, discounted registers	The date of report	Permanent
27	Bills for collection received and sent registers	The date of report	Permanent
28	Clearing cheque registers	The date of report	Permanent
29	Local cheques collection register	The date of report	Permanent
30	Foreign bills for collection register	The date of report	Permanent
31	Foreign bills for negotiation register	The date of report	Permanent
32	Letters of credit ledger- correspondent-wise	The date of report	Permanent
33	Forward exchange contracts ledgers	The date of report	Permanent
34	Cash receipt and payment books (scrolls)	The date of report	Permanent
35	Clearing house books	The date of report	Permanent
36	Pay-slips issued book	The date of report	Permanent
37	Slips, cheques and vouchers relating to MTs, ODs, TTs, FOs and all other deposits, loans, over drafts, bills etc.	The date of report	Permanent
38	Closed account file	The date of report	Permanent
39	Purchase, sale and auction of goods and other securities	The date of report	Permanent
40	Files of drafts and FDs lost	The date of report	Permanent
41	DSD balance confirmations	The date of report	Permanent
42	Files of customers (individuals)	The date of report	Permanent
43	Account confirmations	The date of report	Permanent
44	Applications for overdraft (Loans, advances)	The date of report	Permanent
45	Un-cleared bills	The date of report	Permanent
46	Cheques stopped, returned and pass book register	The date of report	Permanent
47	Cheques issued register	The date of report	Permanent
48	Balancing books	The date of report	Permanent
49	Counterfoils of F.D, Special Term Deposits, Call Deposits etc.	The date of report	Permanent
50	Cheques requisition file	The date of report	Permanent
51	Banker's file (permanent till arrangement is in force)	The date of report	Permanent
52	General files	The date of report	Permanent
53	Legal Advisors' /Empanelment file	The date of report	Permanent
54	Branches ' files	The date of report	Permanent
55	Postal inward	The date of report	Permanent
56	Postal outward	The date of report	Permanent

57	Counterfoils, pay-slips issued-drafts issued	The date of report	Permanent
58	Closed account pass books	The date of report	Permanent
59	Brokers contract file	The date of report	Permanent
60	Safe custody receipts duplicate or counter foils	The date of report	Permanent
61	Inspection reports	The date of report	Permanent
62	Letters of credit advice (cable opening)	The date of report	Permanent
63	Letters of credit advice (to correspondents-amendments)	The date of report	Permanent
64	Letters of credit application forms	The date of report	Permanent
65	Inland letters of credit opening forms	The date of report	Permanent
66	Counter indemnity re. bills and bills of lading	The date of report	Permanent
67	Leave record of ex-employees	The date of report	Permanent
68	Stationary registers	The date of report	Permanent
69	Leave applications of employees	The date of report	Permanent
70	Token register	The date of report	Permanent
71	Reserve Bank G.R.I enclosure letters	The date of report	Permanent
72	Clearing Agent's instruction	The date of report	Permanent
73	Air-mail bank reference file 75. Cable transfer orders.	The date of report	Permanent
74	Mail transfer	The date of report	Permanent
75	Release of guarantee-foreign, bills, uncleared, negotiated under export bills of credit.	The date of report	Permanent
76	Safe Deposit vault ledger/records/files	The date of report	Permanent
77	Safe Deposit vault rent register/records/files	The date of report	Permanent
78	Delivery order forms (Goods loans and loans on shares and other securities)	The date of report	Permanent
79	Remittances dispatched and received registers	The date of report	Permanent
80	Cheque books, draft books and cash certificates registers	The date of report	Permanent
81	Liability registers 84. T.T Confirmations.	The date of report	Permanent

ANNEXURE- III

RECORDS WITH RETENTION PERIOD OF 10 YEARS

Sr.No	Description of Records	Retained as per Bank's Instruction	Retention Period to start from:	No of Years
1	Files Relating to Income Tax, TDS etc.	Hard/Soft Copy	The assessment date	10 years from the date of final Assessment
2	Images of payment instruments (CTS)	Hard/Soft Copy	The date of transaction	10 Years
3	Demand Loan Documents Executed Register	Hard Copy	The date of loan	10 Years
4	Documents relating to closed advances	Hard Copy	From the date of closure	10 Years
5	Gold Loan Register	Hard Copy	The date of loan	10 Years
6	Loan Application received and disposal Register	Hard Copy	The date of report	10 Years
7	Loan Sanction/ Control Register	Hard Copy	The date of Loan	10 Years
8	Term Loan Ledger	Hard Copy	The date of Loan	10 Years
9	TDR Account Opening Forms	Hard/Soft Copy	The date of opening	10 Years, from closure of account
10	Court Cases Files	Hard Copy	The date of report	10 Years from the date of final settlement
11	Documents Relating to Closed Safe Deposit Locker Accounts	Hard Copy	From the date closure	10 years

12	High Value Transactions Register	Hard Copy	From the date of report	10 years
13	Nomination Forms	Hard Copy	From the date of registration	10 Years* * since the closure of account
14	Nomination Register	Hard Copy	From the date of registration	10 Years* * since the closure of account
15	Safe Deposit Locker Access Register	Hard Copy	Date of Access the locker	10 Years
16	Stationery Ledger	Hard Copy	From the date of registration	10 Years
17	Strong Room Access Register	Hard Copy	Date of Access	10 Years
18	Suit filed Register	Hard Copy	From the date of registration	10 Years
19	Vouchers	Hard Copy	From the date of filing.	10 Years
20	Application forms for Debit Card issuance and Debit card Application Received & card Issued / Rejected Register	Hard Copy	From the date of registration	10 Years

21	<p>In case of Insurance Business sourced by the Bank:</p> <p>A. All the records relating to KYC records of client, copy of proposal form signed by client, register containing list of clients, details of policy, details of complaints received from customers, details of Specified Persons i.e. CIFs/SPs etc., shall be maintained by sourcing Branch/Unit for a minimum period of 10 Years. From the date of last transaction on the respective records, or From the date of expiry of the policy, whichever is later.</p> <p>B. Notwithstanding the foregoing, in case where any dispute, claims etc. is raised by any customer or any other party within the aforesaid retention period either in form of a representation, complaint and /or in court or any forum recognized by law, then all the relevant records should be preserved till the time the dispute is finally decided.</p> <p>The retention period in such case may thus be – the final resolution of / Final decision in the dispute, litigation etc. or ten Years from the date of last transaction on the respective records, or ten Years from the date of expiry of the policy, whichever is later.</p>	Hard Copy	From the date of registration	10 Years
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22	Account opening forms/ KYC documents/ documents related to customer/beneficial owners' identification and address proof/ related information and records of the identity of customer/ beneficial owner which include updated records of the identification data, account files, business correspondence and result of any analysis undertaken under rule 3 (Maintenance of Records of Transactions) and rule 9 (Client Due Diligence) of PML (Maintenance of Records) Rules, 2005.	Hard Copy	From the date of opening	10 Years* *From the date of cessation of transaction relationship between Bank and the client.
23	Records of transactions (vouchers, cheques, DD, BCQ, and other transaction related communication etc.)	Hard Copy	From the date of registration	10 Years from the date of transaction
24	Record of cheques presented in clearing/ local clearing	Hard Copy	From the date of report	10 Years from the date of transaction
25	Records relating to Truncated Cheques	Hard Copy	From the date report	10 Years from the date of transaction
26	Records of all transactions taking place through Western Union money transfer	Hard Copy	From the date of report	10 Years from the date of transaction

27	Records of all transactions taking place through NEFT/RTGS containing all originator and beneficiary information	Hard Copy	From the date of report	10 Years from the date of transaction
28	Records of all NPCI/UPI related transactions containing all originator and beneficiary information	Hard Copy	From the date of report	10 Years from the date of transaction
29	Journal Printer Log	Hard Copy/ Soft Copy	From the date of report	10 Years
30	Register for manual recovery of charges/Refund	Hard Copy	From the date of report	10 Years
31	Records pertaining to the identification of the customer and his address (e.g. copies of documents like passport, identity cards, driving license, PAN Card, Utility Bills etc.) obtained while opening the account and during the course of business relationship and records of the identity of customer/ beneficial owner which include updated records of the identification data, account files, business correspondence and result of any analysis undertaken under rule 3 (Maintenance of Records of Transactions) and rule 9	Hard Copy	From the date of report	10 Years

	(Client Due Diligence) of PML (Maintenance of Records) Rules, 2005.			
32	Record relating to outsourcing of Activities to Third Party Vendors /Outside agencies	Hard Copy	From the date of report	10 Years
33	Any document received from the customer relating to standing instructions (Other than with respect to depository account i.e. account held with depository institutions like banks etc.) to transfer funds currently in effect, both in case of U.S. Reportable and Other Reportable Account.	Hard Copy	From the date of registration	10 years
34	Tax remittance challans, Exemption/ concession certificates issued by the Income Tax Department, Declaration on 15G, 15H, Form 60, Form 61 (Upto 31.12.15)	Hard Copy	From the date of registration	10 years
35	Monthly TDS deduct report, Tax exemption certificate reports.	Hard Copy	From the date of report	10 years
36	TDS Return – 26QA	Hard Copy	From the date of report	10 years
37	Returns: 24Q,26Q,27Q	Hard Copy	From the date of report	10 years
38	Other tax related matters not covered above	Hard Copy	From the date of report	10 years
39	Tax remittance challans, Exemption/ concession certificates issued by the Income Tax Department, Declaration on 15G, 15H, Form 60, Form 61	Hard copy	From the date of report	10 years *From the date of closure of the financial Year in which the transaction was put through.

40	Monthly TDS deduct report, Tax exemption certificate reports	Hard copy	From the date of report	10 years
41	TRS related reports	Hard copy	From the date of report	10 years
42	TDS Return – 26QA	Hard copy	From the date of report	10 years
43	Other tax related matters not covered above	Hard Copy	From the date of report	10 years
44	Document / files relating to Income Tax related cases (including TDS related cases), Notices issued by the Income Tax Department & correspondence (Both pre & post centralization period) (Direct Tax)	Hard copy	From the date of report	10 Years from the date of closure of the financial Year in which the transaction was put through.
45	Tax Audit/Income Tax/ Transfer pricing- returns & files (Direct Tax)	Hard copy	From the date of report	10 Years from the date of closure of the financial Year in which the transaction was put through.
46	Charges Invoices with Stax/ Excise /GST components (Service Tax/ GST)	Hard copy	From the date of report	10 Years from the date of closure of the financial Year in which the transaction was put through.
47	Monthly Stax /GST reports (D1,D2,D3)- (Service Tax/ GST)	Hard copy	From the date of report	10 Years from the date of closure of the financial Year in which the transaction was put through.

48	Details of claims lodged with RBI (Service Tax/ GST)	Hard copy	From the date of report	10 Years from the date of closure of the financial Year in which the transaction was put through.
49	Documents relating to closed Safe Deposit Locker Accounts	Hard copy	From the date of report	10 Years
50	Safe Custody Register	Hard copy	From the date of report	10 Years
51	Safe Deposit Register	Hard copy	From the date of report	10 Years
52	Security Register	Hard copy	From the date of report	10 Years
53	Account Opening forms in respect of all types of Deposits, Loans & Advances, Foreign Exchange Transactions & Contracts, Remittances, both Inward and Outward (Inland/ Foreign) etc.,	Hard Copy/ Soft Copy	10 years from the date of cessation of transaction between the customer and Bank	10 Years
54	Specified records of cross selling and registers where customers/third parties "transactions are recorded.		10 years from the date of transaction between the Bank and the client.	10 Years

ANNEXURE-

IV

RECORDS WITH RETENTION PERIOD OF MORE THAN 10 YEARS:

Sl. No.	Title of the Record	Retained as per Bank's Instruction	Retention Period
1	<p>Legal Opinions</p> <p>*Notwithstanding the aforesaid retention period, all Legal Opinions and Correspondences which concern or have been recorded as regards any litigation/ case before a court / forum (raised within the 20 Year retention period), should be preserved till the litigation / case is resolved and/or finally decided. The retention period will thus be the final resolution of/ final decision in the litigation/case or twenty years, whichever is later.</p>	Hard Copy and or Soft Copy	20 Years *
2	Branch Document Register	Hard/Soft Copy	20 Years
3	Fixed Asset Register	Hard/Soft Copy	20 Years
4	RBI/GOI Guidelines Register	Hard/Soft Copy	20 Years
5	<p>Correspondences with Advocates and other functionaries ('Documents)</p> <p>*Notwithstanding the aforesaid retention period, all Legal Opinions and Correspondences which concern or have been recorded as regards any litigation/ case before a court / forum (raised within the 20 Year retention period), should be preserved till the litigation / case is resolved and/or finally decided. The retention period will thus be the final resolution of/ final decision in the litigation/case or twenty years, whichever is later.</p>	Hard Copy and or Soft Copy	20 Years*

6	Register 9-Certificate Cases Register	Hard Copy	20 Years
7	Title Deed Register /Equitable Mortgage Register	Hard/Soft Copy	40 Years
8	Forged Notes Detection/Impounding Register	Hard/Soft Copy	35 Years
9	Safe Deposit Locker Key Register	Hard/Soft Copy	45 Years
10	Safe Deposit Locker Register	Hard/Soft Copy	45 Years
11	Letters of Indemnity, Succession Certificate etc.	Hard/Soft Copy	60 Years
12	Power of Attorney Register	Hard/Soft Copy	60 Years
13	Record Register	Hard/Soft Copy	60 Years

ANNEXURE- V
RECORDS WITH RETENTION PERIOD OF LESS THAN 10 YEARS:

Sl. No.	Title of the Record	Retained as per Bank's Instruction	Retention Period
1	Customer Call Register	Hard/Soft Copy	1 Years
2	Branch Activity Analysis Register	Hard/Soft Copy	3 Years
3	Cash Box Receipt Delivery Register	Hard/Soft Copy	3 Years
4	Outward Clearing Returns Register	Hard/Soft Copy	3 Years
5	Suggestion cum Complaint Register	Hard/Soft Copy	3 Years
6	PF Account Statement file	Hard/Soft Copy	5 Years
7	Welcome Kit Issue Register	Hard/Soft Copy	5 Years
8	Advocates Fees Paid/Received Register	Hard/Soft Copy	5 Years
9	Application Received and Disposal Register for Third Party Products	Hard/Soft Copy	5 Years
10	ATM Cash Replenishment Register	Hard/Soft Copy	5 Years
11	Cash Delivery to CRA/CIT Agency Register	Hard/Soft Copy	5 Years
12	ATM Cards Returned Register	Hard/Soft Copy	5 Years
13	ATM Debit Claim Register	Hard/Soft Copy	5 Years
14	Attendance Register	Hard/Soft Copy	5 Years
15	BM's Monthly Certificate Report	Hard/Soft Copy	5 Years
16	Branch Security Information Register	Hard/Soft Copy	5 Years

17	ATM Cash Balance Verification Register	Hard/Soft Copy	5 Years
18	Cheque Book Requisition Slips	Hard/Soft Copy	5 Years
19	Doorstep Banking Services Registration Register	Hard/Soft Copy	5 Years
20	Excess/Short Cash found in ATM Register	Hard/Soft Copy	5 Years
21	Hardware & Software Purchase Register	Hard/Soft Copy	5 Years
22	Inward Mail Register	Hard/Soft Copy	5 Years
23	Petty Cash Book	Hard/Soft Copy	5 Years
24	Pin mailer issued Register	Hard/Soft Copy	5 Years
25	Stamp Register	Hard/Soft Copy	5 Years
26	Stationery Register	Hard/Soft Copy	5 Years
27	Stopped Cheque Register/Stop Payment Register	Hard/Soft Copy	5 Years
28	System Room Access Register	Hard/Soft Copy	5 Years
29	Vault Register	Hard/Soft Copy	5 Years
30	Card Issued Register	Hard/Soft Copy	5 Years
31	STR,CTR, CCR, NTR, CBWTR, Alerts & CRC Report	Soft Copy	5 Years
32	ATM Card Destroyed Register	Hard Copy	5 Years
33	Title search valuation control Register	Hard /Soft Copy	5 Years

34	Subsidy receivable for PMRY/SJSRY/SCP Report	Hard /Soft Copy	5 Years
36	SME Review Register	Hard /Soft Copy	5 Years
37	ROC Report	Hard /Soft Copy	5 Years
38	LC/BG Register	Hard Copy	5 Years from the date of expiry
39	Drawing Power Register	Hard/Soft Copy	8 Years
40	Insurance policy Register	Hard/Soft Copy	8 Years
41	AMC Register	Hard/Soft Copy	8 Years
42	Cash Balance Book	Hard/Soft Copy	8 Years
43	Cash Found Excess/Short Register	Hard/Soft Copy	8 Years
44	Cheque Referred and Returned Register	Hard/Soft Copy	8 Years
45	Inspection Register	Hard/Soft Copy	8 Years
46	Key Register	Hard/Soft Copy	8 Years
47	Mutilated Notes Register	Hard/Soft Copy	8 Years
48	Standing Instructions Register	Hard/Soft Copy	8 Years
49	Form DN I, Token Register	Hard Copy	8 Years
50	Form DN II, Mutilated, Received, Paid and Rejected Register	Hard Copy	8 Years
51	Form DN III, Register for Rejected of Claim of Note Refund	Hard Copy	8 Years
52	Daily Recording for functioning of CCTV	Hard Copy	8 Years
53	All Correspondence relating to HR issues	Hard / Soft Copy	8 Years

54	Stock Insurance Register	Hard Copy	8 Years
55	Stock Register	Hard Copy	8 Years
56	Annual Returns and copies of all certificates and documents required	Hard / Soft Copy	8 Years
57	Attendance Registers of Board Meetings	Hard / Soft Copy	8 Years
58	Agenda papers. Notice of Board Meeting, Committee Meeting, General Meeting and other related papers	Hard / Soft Copy	8 Years
59	Inspection & Audit Reports	Hard/Soft Copy	Three fully dealt with I&A Reports need to be retained. All earlier reports may be destroyed.
60	Statutory Audit Reports	Hard/Soft Copy	Three fully dealt with I&A Reports need to be retained. All earlier reports may be destroyed.
61	Verification Audit Reports	Hard/Soft Copy	Three fully dealt with I&A Reports need to be retained.
62	FILES RELATING TO AUDIT AND INSPECTION Central Office Inspection & Audit Reports Spot Audit Reports Management Audit Reports Expenditure Voucher Audit Reports Verification Audit Report Concurrent Audit Reports Income Audit Reports Statutory Branch Audit Reports RBI Inspections viz. Financial Reviews, CSITE and other Regulatory Audits. Audit by Accountant General's Officers Other misc. Audits by Govt. Auditors	Hard/Soft Copy	Last 3 reports which have been fully dealt with and treated as closed. However, spot audit report may be filed along with the I&A report subsequent to the date of spot audit and retained as long as the concerned file is retained for 8 years.
63	KYC docs other than Loans	The date of submission to the Bank	5 years from the date of closure of account or the end of the relation with the customer
64	V-CIP RECORDS	The date of submission to the Bank.	The entire data and recordings of V-CIP shall be stored in a system / system located in India. Bank shall ensure that the video recording is stored in a safe and secure manner and bears the date and time stamp that affords

			easy historical data search. The records are to be preserved for at least 5 years after the business relationship is ended. The activity log along with the credentials of the official performing the V-CIP shall be preserved
65	HO Correspondence with branches	The date of correspondence	5 years
66	Concurrent Audit Reports where all comments are rectified and no comments relating to disciplinary proceedings pending	The date of Audit Report	5 years after full rectification

Annexure VI
Records related to HR

Sl. No.	Title of the Record	Retained as per Bank's Instruction	Retention Period
1	Creating, upgrading and designating positions in soft copy	Hard/Soft Copy	Permanent
2	Recruitment/Rejections/Procedures in soft copy	Hard/Soft Copy	Permanent
3	Salary Fixation on Appointment/Promotion etc.	Hard/Soft Copy	Permanent
4	Attendance/ Leave Particulars especially particulars of sick leave/loss of pay/ unauthorized absence etc.	Hard/Soft Copy	Permanent
5	Personal File including Joining Report, NOC, Copy of Certificates, Police Verification Report, Performance Analysis, Disciplinary Proceedings if any, Transfer, Promotion, ESOPs issued, Termination Letter	Hard/Soft Copy	Permanent
6	Details of Attrition	Hard/Soft Copy	Permanent
7	Income Tax, TDS Proofs	Hard/Soft Copy	10 years from the date of Final assessment.
8	Staff confidential reports and disciplinary action cases including voluntary/ compulsory retirement/ termination of service after retirement/ death of employee or closure of the case in all cases.	Hard/Soft Copy	10 Years after retirement/death of the employee and closure of the case)
9	CONFIDENTIAL REPORTS & DISCIPLINARY CASES i. Confidential Reports ii. Investigation Reports/ Charge-sheets iii. Legal Cases of Staff	Hard/Soft Copy	10 Years after the retirement/ death of the employee or closure of the case in all cases.

	<p>iv. Court cases filed against Bank by employees/others</p> <p>v. Individual files of staff disciplinary proceedings including compulsory retirement cases/ termination of service</p> <p>vi. Vigilance department files/ complaints</p> <p>vii. Voluntary retirement cases</p> <p>Note: All correspondence/books /records of our organization which come under the purview of the Central Vigilance Commission in connection with the enquiries instituted/ contemplated by Central Bureau of Investigation (CBI) or any other agency should be retained permanently.</p>		
10	<p>i. Offer of appointment & related correspondence</p> <p>ii. Candidates Bio data cum attestation form submitted at the time of recruitment</p> <p>iii. Verified copy of certificate of education qualification</p> <p>iv. Confirmation Letter</p> <p>v. Promotion Letters</p> <p>vi. Fitment letters on account of promotion to next grade/scale</p> <p>vii. Increment Letter</p> <p>viii. Approval of extension in Service, if applicable</p> <p>ix. AARF, duly reviewed</p> <p>x. Assets and Liabilities statement duly scrutinized</p> <p>xi. Disciplinary Proceedings /Vigilance related letters , etc.</p>	Hard/Soft Copy	10 Years from the date of retirement/termination/separation/death of the staff
11	<p>xii. IR related court cases</p>	Hard/Soft Copy	10 Years after the retirement /death of the employee or closure* of the case whichever is later * Closure means final judgment has been given and no appeal is pending
12	<p>Individual files of staff disciplinary proceedings including, POSH, Vigilance department files/complaints like Investigation Reports, Charge-Sheets, etc.</p>	Hard/Soft Copy	10 Years after the retirement/ death of the employee or closure of case in all cases

Annexure VII

Secretarial and Board Related Matters in Digital Form

Following Board related documents are to be permanently kept in digitalized form:

- Certificate of incorporation, Memorandum/Articles of Association and any Licenses and Permissions
- Listing Agreement
- Minutes of the Board Meeting, various Committees Meetings and General Meetings and Scrutinizer's report
- Statutory Forms and disclosures except routine compliances
- Statutory Registers that may be applicable for listed Banking Company
- Policies Formed by the Bank under various laws and regulations
- Court Orders relating to shareholder matters.
- Register of Members along with the Index
- Other records as may be required under any law(s), from time to time.

Following Documents in Digital Form are to be kept for a minimum period of 8 Years:

- 1. Annual Returns and copies of all certificates and documents required to be annexed thereto.
- 2. Books of account and supporting documents, vouchers, records, contracts, deeds, agreements, etc.
- 3. Attendance Registers of Board Meetings
- 4. All notices under Section 184 of the Companies Act, 2013 read with Rule 9 of the Companies (Meetings of Board and its powers) Rules, 2014.
- 5. Agenda papers, Notice of Board Meeting, Committee Meeting, General Meeting and other related papers.

Executive Level Committee Meetings Records in Digitalised Form

Following Documents in Digital Form are to be kept for a minimum period of 10 Years:

- Minutes of all Executive Committee Meetings like IT Steering Committee, OVRMC, PPAC, ALCO, ISGC, MCE etc.

Annexure VIII

UNIQUE RECORD IDENTIFIERS

A unique record identifier is a numeric or alphanumeric string that is associated with a single entity i.e. an e-record within a given system. The unique record identifier serves as a “filename” for an e-record. Thus, it is persistently linked or associated with the e-record so as to help in its reference, location, identification, authentication, access and control.

Examples of common elements in the unique record identifier

A unique record identifier can be generated by selecting any 3 to 4 relevant elements from the examples given below:

- Name of branch/office.
- Type of document.
- Service code.
- Accession number or registration number or reference number.
- Place.
- Date of creation.
- Name of creator / branch/ office.
- Description or title of content.
- Release date.
- Publication date.
- Project number.
- Department / Section number.
- Records series.
- Version number.
- Other domain specific elements preferred by the organization.

Benefits of assigning unique record identifiers to e-records:

Following are the benefits of assigning the unique record identifiers to e-records –

- i) It serves as a kind of metadata about the e-record.
- ii) It helps in locating the e-records.
- iii) It helps in establishing the referential integrity of e-records and distinguishing between versions.
- iv) The digital rights and access controls are directly linked with the unique identifier of e-record.
- v) It helps in ensuring the trustworthiness and legal admissibility of an e-record.

- vi) The documents and folders associated with an e-record also use the derivatives of its unique identifier.
- vii) It helps in parsing the e-records for meaningful classification or various batch operations.
- viii) It is not possible to aggregate the e-records in a trustworthy digital repository unless they have unique identifiers.

Annexure - IX

ILLUSTRATIVE LIST OF SECURITY ITEMS WITH REFERENCE TO THEIR PLACE OF STORAGE:

Group A - (items to be necessarily held in FBR Strong Room/FBR Safe)	
1	Cash including Single Lock Cash
2	Cash Box
3	Gold Jewellery
4	Articles accepted for safe custody
5	Single Lock Key (duplicate) of Cash Box
6	Double Lock Register/Cash Register/Security Register
7	Duplicate Lock Keys of other branches
8	The contents and original list of inventories of items found in the lockers broken by the Bank.
9	Demand Draft continuous stationery
10	Debit Cards (Personalized and Non-personalized/ other Cards specified
11	Passwords of Branch-in-charge / admin password / ATM number lock details.
12	Valuables / Cash found in branch premises.
13	Foreign Currency Notes pending remittance to FD.
14	Duplicate Key of the Cheque Drop Box
15	Cheques lying in Cheque Drop Box at the end of the day.
16	Any other document/record specifically instructed to be kept in Strong Room / FBR Safe.
17	All counterfeit Notes received back from the police authorities/Courts.

Group B - Items to be held either preferably in FBR/Strong Room/FBR Safe or Fire Resistant Record Cabinet (which basically has a dual locking arrangement)	
i	Loan papers executed by the borrowers
ii	Agreements entered into between the Bank and vendors, if any
iii	Title deeds deposited with the Branch

iv	Returned cheques/Returned Bills yet to be recovered
v	Cash Paid Vouchers
vi	DATs, Tapes, Hard Disks, Compact Discs (CD)etc., containing records/data which are purged/archived from the current data base and not available for online usage.
vii	Receipts obtained from P&T Dept., Electricity Board, Water Supply Dept., etc., towards advance rent/deposit for securing a Post Box/Post Bag, Postal Franking Machine, Electricity Connection, Water Connection, etc.
viii	Cheque Books, Loose Cheque and Welcome Kits.
ix	Unused Locks and Keys.
x	File containing cancelled security items along with the relative register

NOTE:

- 1) The above items are arranged serially basing on their intrinsic security value. The items of lower intrinsic value could always be held with those with higher intrinsic value in the higher group. If space permits, items in Group B could be held with Group A.
- 2)The above list is only illustrative and not exhaustive. Branches/Offices to ensure safe keeping of all security items taking into account the risk factors attached to each item.
- 3) Record relating to Group A and Group B, preserving agreement with outsourcing of Activities through Third Party Vendors /Outside agencies/BCs the retention period should be 10 years.

***** End of Document *****