Document Title: Policy on Preservation of Documents	Reliance Capital Limited
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Reliance Capital Limited

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1. Purpose

This policy outlines the framework for the preservation of documents by Reliance Capital Limited (RCL) an unlisted NBFC-CIC, to ensure compliance with the Companies Act, 2013, RBI regulations, and other applicable laws, and to facilitate efficient record management.

2. Scope

This policy applies to all records and documents, both physical and electronic, created, received, or maintained by the Company in the course of its business operations.

3. Definitions

- "**Act**" means the Companies Act, 2013, and any amendments thereto.
- "**Applicable Law**" means any law, rule, regulation, circular, guideline, or standard under which the preservation of documents is prescribed.
- "**Authorized Person**" means any person duly authorized by the Board of Directors to be responsible for the preservation or disposal of specific documents or records.
- "**Board**" means the Board of Directors of Reliance Capital Limited or any committee thereof.
- "**Books of Account**" shall have the meaning assigned to it under Section 2(13) of the Companies Act, 2013.
- "**Document**" means any paper, note, agreement, notice, agenda, circular, advertisement, declaration, form, minute, register, correspondence, challan, or any other record required under or to comply with any Applicable Law, whether issued, sent, received, or kept in physical or electronic form.
- "**Electronic Form**" means any electronic medium or device used for storing and retrieving information, including but not limited to computers, laptops, servers, cloud storage, and other digital storage devices.

- "**Electronic Record**" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- "**RBI**" means the Reserve Bank of India.

4. Principles of Document Preservation

- **Compliance:** All documents shall be preserved in accordance with the requirements of the Companies Act, 2013, RBI regulations, and other Applicable Laws.
- **Accuracy and Integrity:** Documents shall be preserved in a manner that ensures their accuracy, integrity, and authenticity.
- **Accessibility:** Preserved documents shall be easily accessible to authorized personnel when required.
- **Confidentiality:** Documents containing confidential information shall be protected from unauthorized access and disclosure.
- **Retention Periods:** Documents shall be preserved for the periods specified in the Document Preservation Schedule (Annexure I).
- **Efficient Management:** The preservation of documents shall be carried out in an organized and efficient manner to optimize storage space and facilitate easy retrieval.

5. Roles and Responsibilities

- **Board of Directors:** The Board of Directors is responsible for approving this policy and any amendments thereto.
- **Respective Department Heads:** Department heads are responsible for the maintenance and preservation of documents related to their respective functions.
- **Compliance Department:** The Compliance Department is responsible for ensuring that the policy complies with all Applicable Laws and for providing guidance to other departments on document preservation requirements.

- **IT Department:** The IT Department is responsible for the maintenance and security of electronic records and the Company's document management system.
- **Authorized Persons:** Authorized Persons are responsible for the custody, preservation, and disposal of documents as assigned to them.

6. Document Preservation Schedule

The Company shall adhere to the document preservation schedule outlined in Annexure I to this policy. This schedule specifies the retention periods for various categories of documents, categorized as follows:

- 6.1 **Companies Act, 2013 Records:** Documents required to be maintained under the Companies Act, 2013, including the Memorandum and Articles of Association, minutes of meetings, and registers.
- 6.2 **RBI Records:** Documents required to be maintained as per the directives and circulars issued by the Reserve Bank of India, including customer KYC records and transaction records.
- 6.3 **Tax Records:** Records related to direct and indirect taxes, including income tax returns, GST records, and related documents.
- 6.4 **Other Records:** Other documents relevant to the Company's operations, including financial records, loan documents, HR records, and legal documents.

7. Modes of Preservation

- 7.1 **Physical Records:** Physical documents shall be preserved in a safe and organized manner, protected from damage, loss, or unauthorized access.
- 7.2 **Electronic Records:** Electronic records shall be preserved in appropriate electronic formats and storage media, with regular backups and security measures to prevent data loss or corruption.

8. Document Management System

The Company may implement a document management system (DMS) to facilitate the efficient storage, retrieval, and management of both physical and electronic records. The DMS shall include features for indexing, version control, access control, and audit trails.

9. Document Security

- 9.1 **Physical Records Security:** Physical records shall be stored in secure locations with restricted access, fire protection, and other necessary safeguards.
- 9.2 **Electronic Records Security:** Electronic records shall be protected by appropriate security measures, including access controls, encryption, firewalls, and regular security audits, to prevent unauthorized access, modification, or deletion.

10. Document Disposal

- Documents that have reached the end of their retention period, as specified in the Document Preservation Schedule, and are not required for any legal, regulatory, or business purpose, may be disposed of.
- The disposal of documents shall be carried out in a secure and confidential manner, ensuring that sensitive information is not compromised.
- Electronic documents shall be disposed of by securely deleting them from all storage devices and systems.

11. Record of Document Disposal

A register of documents disposed of or destroyed shall be maintained, containing details such as the type of document, date of disposal, method of disposal, and authorization details.

12. Policy Review and Updates

This policy shall be reviewed and updated at least annually or as and when necessary to ensure compliance with Applicable Laws and to reflect changes in the Company's business operations and regulatory requirements.

13. Interpretation

In the event of any conflict between this policy and any Applicable Law, the provisions of the Applicable Law shall prevail.

14. Annexures

- **Annexure I: Document Preservation Schedule**

This schedule outlines the retention periods for various categories of documents. All documents, whether in physical or electronic form, shall be preserved according to these guidelines.

Document Category	**Document Type**	**Retention Period**	**Responsibility**	**Specific Notes**
Secretarial Records	Memorandum and Articles of Association	Permanent	Company Secretary/Compliance Department	Including any amendments thereto.
Secretarial Records	Certificate of Incorporation	Permanent	Company Secretary/Compliance Department	Including any subsequent changes.
Secretarial Records	Minute Books (Shareholders', Board, and Committee Meetings)	Permanent	Company Secretary/Compliance Department	

Document Category	Document Type	Retention Period	Responsibility	Specific Notes
Secretarial Records	Register and Index of Members	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Corporate Filings with Ministry of Corporate Affairs & Other Regulators	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Resolutions passed by circulation	8 Years	Company Secretary/Compliance Department	
Secretarial Records	Attendance Register (Board and Committee Meetings)	8 Years	Company Secretary/Compliance Department	
Secretarial Records	Register of investments in securities not held in the name of the Company	Permanent	Company Secretary/Compliance Department	

Document Category	Document Type	Retention Period	Responsibility	Specific Notes
Secretarial Records	Register of certificates renewed and duplicate	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Register of contracts in which Directors are interested	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Register of Directors, Managing Director, Manager and Secretary	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Register of Directors' Shareholding	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Register of Inter-corporate loans and investments	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Register of transfer/transmission of shares	Permanent	Company Secretary/Compliance Department	

Document Category	Document Type	Retention Period	Responsibility	Specific Notes
Secretarial Records	Register of Charges	Permanent	Company Secretary/Compliance Department	
Secretarial Records	Notices pertaining to disclosure of Interest by the Directors	8 Years	Company Secretary/Compliance Department	
Secretarial Records	Notice and Agenda of the Board and Committee Meetings	8 Years	Company Secretary/Compliance Department	
Secretarial Records	Register and Index of Debenture Holders	15 Years	Company Secretary/Compliance Department	Or 8 years from the date of redemption of debentures or securities, whichever is later.
Secretarial Records	Engagement letters from Auditors	8 Years	Company Secretary/Compliance Department	

Document Category	**Document Type**	**Retention Period**	**Responsibility**	**Specific Notes**
Secretarial Records	RBI Returns and communications	8 Years	Finance/Compliance Department	As per RBI guidelines.
Accounting Records	Interim/Annual Financial Statements and Audit Reports	Permanent	Accounting Department	
Accounting Records	Statements, Reconciliations & Bank Deposit Slips	8 Years	Accounting Department	
Accounting Records	Books of accounts along with vouchers, records and papers	8 Years	Accounting Department	
Accounting Records	General Ledger	Permanent	Accounting Department	
Accounting Records	Investment Records	8 Years from the Date of Redemption	Accounting Department	
Customer Records	Loan Files and related documents	10 Years	Operations Department	As per PMLA, 2002 guidelines.
Customer Records	KYC of customers	10 years	Operations Department	To be preserved for at least ten

Document Category	Document Type	Retention Period	Responsibility	Specific Notes
				years after the business relationship is ended as per RBI directions of DNBS(PD). CC 164/03.10.042/2009-10 dated November 13, 2009.
HR Records	Employee Personnel Records	5 years after employment ends	HR Department	
HR Records	Payroll Registers	3 years after termination of service/employment	HR Department	
HR Records	Attendance records, application forms, job or promotion records, performance	3 years after termination of service/employment	HR Department	

Document Category	Document Type	Retention Period	Responsibility	Specific Notes
	evaluations, termination papers, enquiry-related papers			
HR Records	Group Insurance Employees Plans Active	8 years	HR Department	
HR Records	Retirement and pension records	Permanent	HR Department	
Insurance Records	Property, D&O, Workers' Compensation, and General Liability Insurance Policies	Permanent	Insurance Department	
Insurance Records	Insurance Policies for the Company	Permanent	Insurance Department	
Insurance Records	Insurance Claims Records	Permanent	Insurance Department	
Legal	Case file of all legal actions against clients	Permanent	Legal Department	

Document Category	**Document Type**	**Retention Period**	**Responsibility**	**Specific Notes**
Management	Strategic Plans	5 Years	Respective Departments	
Management	Disaster Recovery Plan	5 Years	IT Department	
Management	Policies, Charters, Procedures, Manuals, Budgets & Vision Documents	Permanent	Respective Departments	
Properties	Property deeds and purchase/sale agreements	Permanent	Administration Department	
Properties	Property Tax Receipts	Permanent	Administration Department	
Properties	Trademarks, Copyrights and Patents	Permanent	Legal Department	
Taxation	Tax exemption documents & communications	Permanent	Taxation Department	
Taxation	IT Ruling/Case Laws	Permanent	Taxation Department	

Document Category	**Document Type**	**Retention Period**	**Responsibility**	**Specific Notes**
Taxation	Excise Returns, Income Tax Returns, Sales Tax/VAT Returns, Service Tax Return, GST Return	8 Years	Taxation Department	Or for a period of 8 (Eight) Years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.
Taxation	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/VAT, Service tax	8 Years	Taxation Department	
Miscellaneous	Executed copies of contracts/agreements entered by the Company	5 years after termination	Respective Departments	
Miscellaneous	Protected Disclosures as	7 Years	HR/Compliance Department	

Document Category	Document Type	Retention Period	Responsibility	Specific Notes
	mentioned in Whistle Blower and Vigil Mechanism Policy			
Miscellaneous	All Documents containing Intellectual Property Rights	Permanent	Legal/Respective Departments	
Miscellaneous	Register of the Documents disposed/destroyed	Permanent	Compliance Department	

Annexure II: Register of Documents Disposed/Destroyed

This register shall be maintained to record the disposal or destruction of documents.

Sr. No.	**Date of Disposal/Destruction**	**Document Category**	**Document Type**	**Period of Retention as per Policy**	**Brief Particulars of Document**	**Mode of Destruction**	**Authorized Person's Initials**
1	[Date]	[Category]	[Type]	[Retention Period]	[Description]	[Method]	[Initials]
2	[Date]	[Category]	[Type]	[Retention Period]	[Description]	[Method]	[In