

Indiabulls

HOUSING FINANCE

Indiabulls Housing Finance Limited

(CIN: L65922DL2005PLC136029)

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POLICY ON PRESERVATION OF DOCUMENTS

SCOPE AND PURPOSE

The Securities Exchange Board of India (SEBI) on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations, 2015).

Regulation 9 requires the Company to frame and adopt a policy on preservation of documents.

Rule 6 of the Prevention of Money-laundering (Maintenance of Records of the Nature and Value of Transactions, the Procedure and Manner of Maintaining and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 (hereinafter referred as “PMLA”) also provides for retention of records for a specified time.

Accordingly, this Policy on Preservation of Documents has been approved and adopted by the Board of Directors of the Company at its meeting held on October 21, 2015 and shall be effective from December 1, 2015 to ensure compliance with SEBI regulations and PMLA provisions as applicable to the Company from time to time.

The provisions of the Policy shall be applicable to all subsidiaries (including registered NBFCs) of the Company.

DEFINITIONS

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of Indiabulls Housing Finance Limited, as constituted from time to time.

B. “Company”

Company shall mean “Indiabulls Housing Finance Limited”.

C. “Documents”

Documents shall mean all papers, records, files, books, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

D. “Listing Regulations”

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

OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature (as per **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (as per **Annexure 2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

- C. Retention of records in compliance with the Provisions of PMLA

The records referred to in Rule 3 of PMLA, as applicable to the Company including its subsidiaries, shall be maintained for a period of **ten years** from the date of the closure of the account between the client and the Company (list of such records are as per **Annexure 3**).

Rejected loan applicant’s KYC documents and other particulars furnished by the client shall be preserved for a period for ten years from the date of rejection.

Audit trail of transactions of all accounts/documents, ledgers and records of transactions on the basis of which CTR, STR or CRR etc. have been filed with FIU will be preserved for fifteen years after the filing of report or till the disposal of court cases, if any, filed based on the report.

ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy as mentioned in SEBI regulations/ PMLA Act/NHB and RBI directives as well as Companies Act.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents/ records. Destruction of documents can be undertaken periodically with the approval of HOD of the department concerned. A list of document and date of destruction of such destroyed documents have to be maintained in the department.

COMMUNICATION AND DISSEMINATION OF THE POLICY

A copy of this policy shall be posted on the web-site of the Company.

AMENDMENTS

The Board or the Management Committee may, subject to the applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy with a new policy. However, any such amendment or modification shall not be inconsistent with the applicable provisions of any law for the time being in force.

(Continued for Annexure 1, 2 & 3)

Annexure 1

Documents whose preservation shall be permanent in nature

S. No.	Nature of Document(s)
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Material Agreements/Contracts
09	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2*

Documents with preservation period of not less than eight years after completion of the relevant transactions

S. No.	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Personnel Documents
04	Insurance Policies/ Claims under various policies
05	Correspondences with the Regulators
06	Non-Statutory Registers/Documents
07	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Annexure 3 *

Documents with preservation period of not less than ten years after the date of closure of the relevant Account/transactions

S. No.	Nature of Document(s)
01	Clients KYC documents
02	Records of transaction & ledger book
03	Personnel information/Documents

* Except for documents need to be maintained for 15 years in item 'C'.
