

ICICI BANK RECORD MANAGEMENT POLICY

I. INTRODUCTION

1. ICICI Bank Limited ("**ICICI Bank**") being a listed entity is required to adopt a policy for preservation of documents in accordance with Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**LODR**").
2. Given that ICICI Bank is a banking and financial services company, undertaking multiple regulated businesses, in addition to LODR, various other applicable laws govern ICICI Bank's policy on data retention and purging.
3. The Board of Directors has adopted this Policy.

II. PURPOSE AND SCOPE

1. The purpose of this Policy is to create a broad framework for ensuring that: (a) all official records and documents are adequately handled and preserved; and (b) all records and documents that are no longer required and have no value are appropriately purged, in accordance with applicable law and best industry practice.
2. This Policy applies to all Records, whether in electronic, paper or other form, created or received by an Employee in the course of carrying out his/her designated duties and functions.
3. This Policy applies to ICICI Bank as a whole, including all its branches, offices and departments, in both India and overseas.
4. On the subject matter of this Policy, all additional requirements under law applicable to overseas jurisdictions shall be deemed to have been incorporated into this Policy. In the event more stringent requirements have been prescribed under laws applicable to overseas jurisdictions, such requirements shall (to that extent) override the terms of this Policy in relation to that jurisdiction.
5. In case any provision of this Policy is inconsistent with applicable law, applicable law shall prevail.

III. DEFINITION

Unless specified otherwise, defined terms used in this Policy shall have the following meaning:

Board of Director(s) means the Board of Directors of ICICI Bank.

Department Head in relation to a particular department/group within ICICI Bank, means an Employee who heads that department/group (not being a Director) and whose grade is not below JGM or equivalent.

Director(s) means whole-time directors of ICICI Bank, including Chairman, Managing Director and Executive Directors.

Electronic Records means all Records in electronic or digital format.

Employee(s) means and includes all the Directors, officers and employees of ICICI Bank, whether temporary, permanent, full time or part time. It is clarified that any person who: (a) is on secondment; and/or (b) is working on contractual basis (including through an agency), with ICICI Bank shall also be deemed to be an Employee.

ICICI Bank means ICICI Bank Limited, including its overseas branches.

Operating Guidelines means the guidelines (including PAC notes) issued by a Department Head to the Employees of their respective departments under this Policy.

Original Format means the format (electronic, physical or otherwise) in which the Record was created or received.

Physical Records means all Records other than Electronic Records.

Policy means this ICICI Bank Record Management Policy.

Preservation Period in relation to a Record means the period for which that Record must be preserved in accordance with this Policy.

Proceeding(s) includes any and all: (a) litigations, arbitrations and other alternate dispute resolution mechanisms; and/or (b) regulatory, governmental, judicial, investigative agencies

or administrative actions/inquiries/investigations, against any of the ICICI Bank or its Employees in their official capacity.

Record(s) includes any and all documents, agreements, written information, data, records and communications, whether in electronic, paper or other form, created or received by an Employee in the course of carrying out his/her designated duties and functions.

For avoidance of doubt, it is clarified that Records will include emails, documents, photos, voice mails, messages, notes, data on CD/pen drive, presentations, information memoranda, letters etc.

Retention and Purging Policies in relation to an Employee means: (a) this Policy; (b) respective Operating Guidelines; (c) Technology Guidelines; and (d) Information Security Policy.

Senior Group Head – Legal means a member of the Corporate Legal Group whose grade is AGM or above.

Subject means the client/matter/transaction in relation to which the Record Hold Notice is issued.

Technology Guidelines means the guidelines issued in relation to Electronic Records by the Information Technology Group.

IV. SCHEME OF THE POLICY

1. This Policy stipulates the broad framework that needs to be followed by all Employees. This Policy should be read along with: (a) respective Operating Guidelines; (b) Technology Guidelines; and (c) Information Security Policy.
2. All Department Heads must issue Operating Guidelines, through which specific instructions are communicated to their respective departments/groups on a regular basis, which are supplemental and/or incremental to the obligations under this Policy.
3. Information Technology Group must issue Technology Guidelines in relation to Electronic Records, through which specific instructions are communicated to all Employees on a regular basis, which are supplemental and/or incremental to the obligations under this Policy.

4. Notwithstanding anything contained in any other policy, procedure or circular of ICICI Bank, all Employees shall comply with the provisions of the Retention and Purging Policies, both in letter and spirit.
5. Employees must ensure that all vendors or third party contractors, who handle or are in possession of Records, broadly comply with the provisions of Retention and Purging Policies.

V. EMPLOYEE OBLIGATION

All Employees, including Department Head, shall comply with the following:

A. Record Maintenance

1. **"Record Maintenance"** is the efficient and systematic control of creation, receipt, maintenance, use, preservation and purging of Records.
2. In relation to Records owned/handled by an Employee, the Employee must ensure that he/she undertakes Record Maintenance through the full life cycle of the relevant Record, i.e. from creation or receipt, maintenance, managing its use, access, storage and retrieval, to purging.
3. To ensure all Records are maintained/handled in an appropriate manner, Employees must ensure that, Records are handled in a manner adequate to their classification, as stipulated in the Information Security Policy. An indicative list of classification as stipulated in the Information Security Policy is as follows:
 - a. **Secret Records** - Records that are extremely sensitive and confidential, which can be accessed only by select pre-approved Employees. The unauthorized disclosure of these Records could reasonably be expected to cause grave material damage, adversely impacting ICICI Bank, its shareholders, Employees, business partners and/or customers; or
 - b. **Confidential Records** - Records that are sensitive and confidential, which are made available only to specific functions, groups or roles. The unauthorized disclosure of these Records could reasonably be expected to cause grave material damage adversely impacting ICICI Bank, its shareholders, Employees, business partners and/or customers; or
 - c. **Internal Records** – Records that are for use by Employees only, and need to be protected from unauthorized external entities. Only authorized users shall be

granted access to these Records, on a need to know basis, for business related purposes.

- d. **Public Records** - Records that are not of confidential nature and have explicitly been approved by Department Heads or Employees authorized by Department Heads, for release to public.

Hereinafter, Public Records and Internal Records shall be collectively referred to as "**Normal Records**".

- 4. Employees must ensure that Records handled/owned by them are:
 - a. maintained in an accurate, timely, safe and confidential manner; and
 - b. managed/handled, transmitted/communicated and/or stored in accordance with Operating Guidelines and Technology Guidelines.

B. Record Preservation

1. Preservation Period

- 1.1 "**Record Preservation**" refers to keeping Records in good order and to prevent it from being damaged or destroyed.
- 1.2 Unless otherwise stated, the department/group which is the primary/official holder/owner of the Record has the primary obligation to ensure preservation of that Record.
- 1.3 Unless otherwise stated, Employees shall ensure that Records classified into a particular Group (defined below) are preserved till the expiry of the timeline mentioned in the Operating Guidelines, which shall be calculated with reference to the date mentioned by the Department Head during classification ("**Reference Date**").
- 1.4 Notwithstanding anything, the obligation of Employees to preserve Records is subject to the following conditions:
 - a. the Indicative classification of Records in Schedule 1 of this Policy, which sets the preservation timeline required for each type of Record;
 - b. Records that are not classified into any of the Groups, must be preserved for a period determined by the Department Head;
 - c. Records which are subject to a Record Hold Notice shall not be purged till such time the Record Hold Notice is effective; and

- d. Records which are subject to any Proceeding shall be preserved till the time the Proceeding is completed and approval of a Senior Group Head – Legal has been obtained.
- e. Records, in respect of which a claim is pending, shall not be purged till the time the claim is settled and approval of a Senior Group Head – Legal has been obtained.

2. Format of Preservation

- 2.1 Unless otherwise stated in Operating Guidelines or Technology Guidelines, all Records must be preserved in their Original Format.
- 2.2 In the event Records are being stored in a format other than Original Format (if permitted under Operating Guidelines), Employees must ensure that: (a) the chosen format is compliant with Operating Guidelines or Technology Guidelines; and (b) necessary record is maintained regarding the whereabouts of the Original Format of the Record.
- 2.3 Irrespective of the format in which a Record is stored, Employees must ensure that:
 - a. quality, relevance, accessibility and reliability of the Record is adequate and suitable; and
 - b. Record is accessible and retrievable.

3. Preservation Method and Location

- 3.1 Employees must ensure that Records are preserved, either on-site or off-site, in accordance with Operating Guidelines and Technology Guidelines.
- 3.2 In relation to Off-Site Preservation (defined below in clause VI(B)(4)), no Record (other than Records pertaining to business/activity carried on by an overseas branch of ICICI Bank) shall be maintained in overseas location.
- 3.3 In relation to Confidential Records and Secret Records, Employees must take additional care to ensure that these Records are not mixed up with Normal Records.
- 3.4 In relation to Off-Site Preservation, Employees must ensure that:
 - a. adequate details relating to Records stored in the warehouse are maintained;
 - b. Records must be stored in a manner so as to ensure they are easily retrievable;

- c. only those Records which are to be warehoused in accordance with Operating Guidelines are warehoused; and
- d. Records are stored only in warehouses approved by Retail Channel Infra Group and/or Facilities Management & Administration Group.

C. Record Purging

- 1. Employees must undertake timely purging of Records post expiry of Preservation Period, in accordance with Retention and Purging Policies.
- 2. Purging of every Record must be approved by an Employee (of the same group/department) in accordance with Operating Guidelines, through i-memo. In relation to Records owned by multiple groups/departments, approval of all departments/groups that own the Record must be taken prior to purging. These i-memo must be preserved permanently. It is clarified that Department Heads must ensure that the person approving the purging is of adequate seniority.
- 3. Purging of every Record must be witnessed by an Employee authorized by a Department Head, whose grade is senior to the one undertaking the purging.
- 4. Unless approved by a Senior Group Head – Legal, Employees shall not purge any Record that is subject to Record Hold Notice or any Proceeding.

VI. DEPARTMENT HEAD OBLIGATIONS

- 1. Department Heads will be responsible for ensuring that Employees in their respective departments/groups comply with this Policy, Operating Guidelines and Technology Guidelines.
- 2. Department Heads must issue Operating Guidelines, periodically reviewed, covering the following:

A. Record Maintenance

- 1. In relation to Record Maintenance, Department Heads must ensure that Employees of their respective departments/groups adopt the best practice of Record Maintenance, which shall include ensuring that:
 - a. ICICI Bank has sufficient data to monitor, assess and control risks incurred by it;

- b. ICICI Bank can comply with all its statutory and regulatory obligations;
 - c. ICICI Bank can take timely decisions based on available information;
 - d. access to Confidential Records, Secret Records and Internal Records are restricted to only authorized individuals;
 - e. customer confidentiality and privacy is maintained at all times;
 - f. the nature and purpose of each transaction is capable of being explained or substantiated;
 - g. periodic testing is undertaken to ensure recovery of data, business continuity and disaster recovery systems are in place as per ICICI Bank's Information Security Policy;
 - h. adequate mechanism is in place for transfer of Records upon resignation/transfer of Employees; and
 - i. Records are available to authorized individuals on a timely basis.
2. In relation to Record Maintenance, Operating Guidelines must contain the following:
- a. guidelines on the type of Records to be classified as – (a) Secret Records; (b) Confidential Records; (c) Internal Records and (d) Public Records;
 - b. the manner in which Records (other than Electronic Records) must be handled, maintained and/or transmitted/communicated; and
 - c. specific guidelines on handling and sharing of Secret Records and Confidential Records.
3. In relation to Electronic Records, Operating Guidelines shall require Employees to comply with the Technology Guidelines.

B. Record Preservation

1. The Operating Guidelines must list out all type of Records that are owned by their department/group, for which the department will have the primary obligation to ensure preservation. It is hereby clarified that in relation to Electronic Records, the Records will be deemed to be collectively owned by all departments whose products use the Records.
2. Department Head shall, in consultation with Corporate Legal Group, respective Business Group and Information Technology Group, through Operating Guidelines, ensure classification of Records owned by their department/group into the following groups, which shall be reviewed periodically (at least annually):
- a. **Group A:** Records that are to be preserved for a period of 10 years.

- b. **Group B:** Records that are to be preserved permanently.
- c. **Group C:** Records that need not be preserved.

Group A, Group B and Group C shall collectively be referred to as “**Groups**” and individually as “**Group**”.

3. The Department Heads must determine the classification of Records in Groups on the following basis:
 - a. statutory timelines prescribed under applicable law;
 - b. indicative classification of Records (or type of Records) as detailed in Schedule 1;
 - c. any request from internal auditors/legal counsels; and
 - d. time for which the Record will be relevant to business functions.

Provided that, indicative classification of Records in Schedule 1 of this Policy sets the minimum preservation timeline required for each Record.

4. In relation to Records (other than Electronic Records), Department Heads must prescribe, through Operating Guidelines, the method and location of Record Preservation, which shall include:
 - a. Period for which the Records must be preserved with ICICI Bank on site (“**On-Site Preservation**”); and
 - b. Period for which the Records must be archived with warehousing agencies off-site (“**Off-Site Preservation**”).
5. Secret Records must be preserved only through On-Site Preservations, and shall not be stored off-site.
6. Department Heads must require all Records to be preserved in their Original Format. However, in relation to certain Records, if preserving the Record in Original Format is not possible or feasible, Department Heads may, in consultation with Corporate Legal Group, issue guidelines (through Operating Guidelines) for preserving these Records in format other than Original Format.
7. In the event Records are being stored in format other than Original Format, Department Heads must ensure their departments maintain a record of the whereabouts of the Original Format of the Record. For instance, if the Original Format is held with the customer or government authority, the same must be recorded.

8. Department Heads must ensure Records are maintained in a manner that facilitates timely purging of Records.
9. Despite all necessary precaution, in the event the Records are destroyed by fire, flood, earthquake or any other Act of God, prior to the expiry of Preservation Period, Department Heads must ensure: (a) a list of all Records destroyed along with reasons is maintained; and (b) necessary action is undertaken to facilitate retrieval of the Record.

C. Record Purging

1. Department Heads shall ensure that all Records owned by their departments/groups are purged within 12 months of expiry of the Preservation Period. In relation to Electronic Records, where relevant, Department Heads must ensure Information Technology Group is directed to purge Records, so as to ensure timely purging of Electronic Records.
2. In relation to Records (other than Electronic Records), Operating Guidelines must contain:
 - a. process to be followed by Employees for purging of Records post completion of Preservation Period; and
 - b. the method to be adopted for purging of Records. It is recommended that the preferred method for purging is shredding.
3. Department Heads must ensure that a register is maintained by the department/group wherein the following details shall be maintained:
 - a. Particulars of the Record purged;
 - b. Name and designation of the Employee who approved the purging;
 - c. Date of such approval;
 - d. Date and mode of purging;
 - e. Employees who witnessed the purging; and
 - f. i-memo reference number (approving the purging).
4. Department Heads must ensure that special care is taken by Employees while undertaking purging of Secret Records and Confidential Records.
5. In relation to Electronic Records, Information Technology Group shall prescribe guidelines for purging of Records.

6. Department Heads must ensure the position of old Records is reviewed in a timely manner (at least once in a financial year) and that old Records within their department/group are being purged in accordance with the Retention and Purging Policies.

VII. RECORD HOLD

1. Record Hold Notice

- 1.1 A Senior Group Head – Legal may issue a Record Hold Notice (substantially in the format specified in Schedule 2) to any or all Employees, who are connected or involved with the Subject (as described in the Record Hold Notice), upon becoming aware or reasonably suspecting the initiation of a Proceeding against ICICI Bank and/or its Employees.
- 1.2 Notwithstanding anything, a Senior Group Head - Legal may, at any time, for any reason whatsoever, issue a Record Hold Notice to any and all Employees.
- 1.3 The Record Hold Notice shall be valid till such time it is not withdrawn by a Senior Group Head – Legal. It is clarified that only a Senior Group Head – Legal may, either wholly or partly, withdraw a Record Hold Notice.
- 1.4 Corporate Legal Group shall maintain a repository of all Record Hold Notices issued by a Senior Group Head – Legal.

2. Obligation of Employees

- 2.1 Upon receiving a Record Hold Notice, the Employees must immediately follow the Record Hold Protocol till such time the Record Hold Notice is withdrawn.
- 2.2 In addition to following the Record Hold Protocol, upon becoming aware of a Record Hold Notice, Department Heads shall ensure that all Employees in their department/group connected or involved with the Subject are issued a Record Hold Notice.
- 2.3 Unless otherwise approved by a Senior Group Head - Legal, if an Employee (including member of Internal Audit Group) becomes aware or reasonably suspects the initiation of a Proceeding against ICICI Bank and/or its Employees, such Employee must

immediately follow the Record Hold Protocol and inform a member of the Corporate Legal Group.

3. Record Hold Protocol

- 3.1 Upon receiving a Record Hold Notice, the recipients shall be obligated to, unless otherwise approved by a Senior Group Head – Legal
 - a. take all reasonable steps to prevent/suspend the automatic, intentional or accidental deletion, alteration, purging or destruction of any Record in relation to the Subject (as specified in the Record Hold Notice), either wholly or partially, received or created either prior to or post the issuance of Record Hold Notice;
 - b. ensure all external communications in relation to the Subject (as specified in the Record Hold Notice) are in writing, and where oral communication is unavoidable, ensure all such oral communication is recorded in writing;
 - c. ensure retention of Records in relation to the Subject (as specified in the Record Hold Notice), as far as possible, in their Original Format/form;
 - d. identify Employees who have not been issued Record Hold Notice but who should be, and communicate those names to the Senior Group Head – Legal issuing the Record Hold Notice; and
 - e. comply with such other direction/condition as may be stipulated in the Record Hold Notice.
- 3.2 It is clarified that the Record Hold Protocol shall be applicable only in relation to the Subject (i.e. matter, client or transaction), as may be specified in the Record Hold Notice.

VIII. OBLIGATION OF OTHER GROUPS

A. Information Technology Group

1. Information Technology Group shall be responsible for issuing guidelines (through Technology Guidelines) in relation to Electronic Records, to all Employees.
2. In relation to Electronic Records, the Technology Guidelines must contain guidelines on the following:
 - a. manner in which Employees are required to undertake Record Maintenance (i.e. handling, maintaining and communicating Records);

- b. specific guidelines dealing with handling and communication of Internal Records, Secret Records and Confidential Records; and
 - c. method and manner in which Records must be preserved and purged.
- 3. In relation to preservation of Electronic Records, Information Technology Group shall ensure the following:
 - a. compliance with all applicable laws and Retention and Purging Policies in consultation with Compliance and Corporate Legal Group;
 - b. the integrity and accessibility of the electronic/digital Records is maintained;
 - c. confidentiality and accuracy of the Record is maintained at all times;
 - d. Records are accessible to authorized individuals on a timely basis; and
 - e. periodic testing is undertaken to ensure recovery of data if required.
- 4. Upon being directed in accordance with this Policy, Information Technology Group shall ensure deletion of Electronic Records. It must be ensured that necessary care is taken when purging Confidential Records and Secret Records.
- 5. Information Technology Guidelines shall require Employees to purge all emails within 10 years of creation of the email.
- 6. In the event a Record Hold Notice is issued, Information Technology Group must put in place adequate mechanisms to ensure Electronic Records (relating to the subject matter of the Record Hold Notice) are not destroyed/purged.

B. Retail Channel Infra Group and Facilities Management & Administration Group

- 1. Retail Channel Infra Group and/or Facilities Management & Administration Group, will be responsible in finalizing warehousing facilities to be used by ICICI Bank for Off-Site Preservation.
- 2. While selecting a warehouse for Off-Site Preservation of Records, the following must be ensured:
 - a. the warehouse used must be spacious, well-constructed and free of attacks from pests, fungus, termites, etc.;
 - b. the warehouse must be compliant with all applicable laws including fire-safety regulations;

- c. the warehouse used must have proper and adequate lighting, electrical and fire safety arrangements;
- d. the warehouse has adequate safeguards to protect Records in the event of a natural calamity; and
- e. the warehouse should not be accessible to outsiders and unauthorized persons.

C. Information Security Group

- 1. Information Security Group shall update the Information Security Policy from time to time.

IX. MISCELLANEOUS

- 1. For any guidance on suggested methods to be followed in relation to handling, maintaining, communicating or preserving Electronic Records, Employees may contact the respective technology representative from the Information Technology Group supporting the department.
- 2. For all other matters, the Employees may contact their Department Heads or a member of the Corporate Legal Group.
- 3. This Policy will be reviewed by Corporate Legal Group every year or at the time of any major changes in the existing environment which would affect the areas covered in this Policy.

SCHEDULE 1
INDICATIVE CLASSIFICATION FOR PRESERVATION

I. Group A – Records to be maintained for 10 years

Record	Reference Date
Cheque Book Registers	Current calendar year
Delivery Order Registers	Current calendar year
Demand Liability Registers	Current calendar year
Demand Remittances Dispatched Registers	Current calendar year
Demand Remittances Received Registers	Current calendar year
Vault Registers	Current calendar year
As a Merchant Banker, shall maintain the following: (i) A copy of balance sheet as at the end of each accounting period (ii) A copy of profit and loss account for that period (iii) A copy of the auditor 's report on the accounts for that period (iv) A statement of financial position (v) Records and documents pertaining to due diligence exercised in pre-issue and post-issue activities of issue management and in case of takeover, buyback and delisting of securities ¹	Document date
As an Underwriter, shall maintain the following: (i) a copy of the balance sheet and profit and loss account as specified in sections 211 and 212 of the Companies Act, 1956 (1 of 1956) (ii) a copy of the auditor's report referred to in section 227 of the Companies Act, 1956 (1 of 1956)	Transaction date
Account files and business correspondence relating to clients	End of business relationship or account closure, whichever is later
As a Debenture Trustee, shall maintain books of account, records and documents, relating to the trusteeship functions	Redemption date
As an Investment Adviser, shall maintain the following: (i) Risk profiling and risk assessment of the client	Transaction date

¹ This needs to be maintained in the Original Format.

Record	Reference Date
<ul style="list-style-type: none"> (ii) Suitability assessment of the advice being provided (iii) Copies of agreements with clients, if any (iv) Investment advice provided, whether written or oral (v) Rationale for arriving at investment advice, duly signed and dated (vi) A register or record containing list of the clients, the date of advice, nature of the advice, the products/securities in which advice was rendered and fee, if any charged for such advice 	
Record of all disclosures made under the SEBI (Prohibition of Insider Trading) Regulations	Disclosure Date
<p>As a Custodian under SEBI (Custodian of Securities) Regulations, 1996, shall maintain the following:</p> <ul style="list-style-type: none"> (i) Records containing details of instructions received from and sent to clients (ii) Records containing details of monies received and released on behalf of each client (iii) Records containing details of registration of securities in respect of each client (iv) Records containing details of rights or entitlements of each client arising from the securities held on behalf of the client (v) Records containing details of securities, assets or documents received and released on behalf of each client (vi) Records of all reports submitted to the Board (vii) Ledger for each client 	Transaction Date
<p>As a Stock Broker, shall maintain the following:</p> <ul style="list-style-type: none"> (i) Register of transactions (Sauda Book) (ii) Clients ledger (iii) General ledger (iv) Journals (v) Cash book (vi) Bank pass book (vii) Documents register containing, inter alia, particulars of securities received and delivered in physical form and the statement of account and other records relating to receipt and delivery of securities provided by the depository participants in respect of dematerialized securities 	Transaction date

Record	Reference Date
<ul style="list-style-type: none"> (viii) Member's contract books showing details of all contracts entered into by him with other members of the same exchange or counterfoils or duplicates of memos of confirmation issue to such other members (ix) Counterfoils or duplicates of contract notes issued to clients (x) Written consent of clients in respect of contracts entered into as principals (xi) Margin deposit book (xii) Registers of accounts of sub-brokers (xiii) An agreement with a sub-broker specifying the scope of authority, and responsibilities of the Stock Broker and such Sub-broker 	
<p>Suspicious transaction records whether or not made in cash and by way of:</p> <ul style="list-style-type: none"> (i) deposits and credits, withdrawals into or from any accounts in whatsoever name they are referred to in any currency maintained by way of: <ul style="list-style-type: none"> (a) cheques including third party cheques, pay orders, demand drafts, cashiers cheques or any other instrument of payment of money including electronic receipts or credits and electronic payments or debits, or (b) travellers cheques, or (c) transfer from one account within the same banking company, financial institution and intermediary, as the case may be, including from or to Nostro and Vostro accounts, or (d) any other mode in whatsoever name it is referred to (ii) credits or debits into or from any non-monetary accounts such as demat account, security account in any currency maintained by the banking company, financial institution and intermediary, as the case may be (iii) money transfer or remittances in favour of own clients or non-clients from India or abroad and to third party beneficiaries in India or abroad including transactions on its own account in any currency by any of the following: <ul style="list-style-type: none"> (a) payment orders, or 	Transaction date

Record	Reference Date
<ul style="list-style-type: none"> (b) cashiers cheques, or (c) demand drafts, or (d) telegraphic or wire transfers or electronic remittances or transfers, or (e) internet transfers, or (f) Automated Clearing House remittances, or (g) lock box driven transfers or remittances, or (h) remittances for credit or loading to electronic cards, or (i) any other mode of money transfer by whatsoever name it is called <p>(iv) loans and advances including credit or loan substitutes, investments and contingent liability by way of:</p> <ul style="list-style-type: none"> (a) subscription to debt instruments such as commercial paper, certificate of deposits, preferential shares, debentures, securitised participation, inter bank participation or any other investments in securities or the like in whatever form and name it is referred to, or (b) purchase and negotiation of bills, cheques and other instruments, or (c) foreign exchange contracts, currency, interest rate and commodity and any other derivative instrument in whatsoever name it is called, or (d) letters of credit, standby letters of credit, guarantees, comfort letters, solvency certificates and any other instrument for settlement and/or credit support <p>(v) collection services in any currency by way of collection of bills, cheques, instruments or any other mode of collection in whatsoever name it is referred to</p>	
Telegrams and Telegram Confirmations	Current calendar year
Telegraphic Transfer Confirmations	Current calendar year
<p>As a Banker to an Issue, shall maintain the following:</p> <ul style="list-style-type: none"> (i) The number of applications received, the names of the investors, the dates on which the applications were received and the amount so received from the investors 	Date of record

Record	Reference Date
(ii) The time within which the applications received from the investors were forwarded to the body corporate or registrar to an issue, as the case may be (iii) Dates and amount of refund monies paid to the investors (iv) Dates, names and amount of dividend/interest warrant paid to the investors	
Transactions records specially the following transaction records: (i) All cash transactions of the value of more than ten lakh rupees or its equivalent in foreign currency (ii) All series of cash transactions integrally connected to each other which have been individually valued below rupees ten lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ten lakh rupees or its equivalent in foreign currency (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 or where any forgery of a valuable security or a document has taken place facilitating the transactions (v) All cross border wire transfers of the value of more than five lakh rupees or its equivalent in foreign currency where either the origin or destination of fund is in India (vi) All purchase and sale by any person of immovable property valued at fifty lakh rupees or more that is registered by the reporting entity, as the case may be	Transaction date
Correspondence with branches	End of transaction
RBI inspection reports where all comments are rectified and no comments relating to disciplinary proceedings pending	Date of report
Concurrent audit reports where all comments are rectified and no comments relating to disciplinary proceedings pending	Date of report
Loans and advance registers and ledgers	Current calendar year
Call, short or fixed deposit registers or ledgers	Current calendar year
F. D. Interest registers	Current calendar year

Record	Reference Date
Draft T. T. and Mail Transfer Registers	Current calendar year
Remittance Registers	Current calendar year
Bills Registers	Current calendar year
Clearing Registers	Current calendar year
Demand Loan Liability Registers	Current calendar year
Draft and Mail Transfer Advices Dispatched Registers	Current calendar year
Draft and Mail Transfer Advices Received Registers	Current calendar year
Draft payable registers	Current calendar year
Drawing Power Registers	Current calendar year
Stock registers of goods pledged	Current calendar year
Stock and share registers	Current calendar year
Government Securities Registers or ledgers	Current calendar year
Registers showing collection of dividends and interest on securities on behalf of constituents	Current calendar year
Registers or ledgers of bank's own investments	Current calendar year
Overdrafts and Loan Registers	Current calendar year
Safe Custody Registers	Current calendar year
Equitable Mortgage Registers	Current calendar year
Trust Registers	Current calendar year
Register of debenture holders and other securities holders (i.e. other than register of members)	Redemption date
Register for deposits accepted or renewed	Financial year
All personal ledgers	Current calendar year
Branch Ledgers	Current calendar year
Clean Cash Books	Current calendar year
Bank Cash Scrolls	Current calendar year
Bank Transfer Scrolls	Current calendar year
Remittance Schedules	Current calendar year
Paid cheques	Current calendar year
Paying in slips	Current calendar year
Vouchers relating to DDs, TTs, MTs, Fixed Deposits, Call Deposits, Cash credits and other deposit and loan accounts including vouchers relating to payment to nominees	Current calendar year
Standing Instructions regarding current accounts	Current calendar year
Applications for TTs, DDs, MTs, and other remittances	Current calendar year
Applications for overdrafts, loans and advances	Current calendar year
Press-copy books	Current calendar year

Record	Reference Date
As an Authentication User Agency, shall maintain logs of authentication transaction, which contain transaction details	Transaction date
Copies of annual return filed	Filing date with the Registrar
Disclosures by directors of their concerns or interest in other companies or bodies corporate	Financial year
<p>As a Depository, shall maintain the following:</p> <ul style="list-style-type: none"> (i) Records of securities dematerialised and rematerialized (ii) The names of the transferor, transferee, and the dates of transfer of securities (iii) A register and an index of beneficial owners (iv) Details of the holding of the securities of beneficial owners as at the end of each day (v) Records of instructions received from and sent to participants, issuers, issuers' agents and beneficial owners (vi) Records of approval, notice, entry and cancellation of pledge or hypothecation, as the case may be (vii) Details of participants (viii) Details of securities declared to be eligible for dematerialisation in the depository <p>Such other records as may be specified by the Board for carrying on the activities as a depository</p>	Transaction date
<p>As a Clearing Corporation, shall maintain the following:</p> <ul style="list-style-type: none"> (i) Minute books of the meetings of: <ul style="list-style-type: none"> (a) Governing board (b) Any committees of the governing board (ii) Record of clearing members showing their full names, addresses and details of bank and depository accounts for settlement purposes (iii) Transaction records (iv) Record of security deposits (v) Margin deposits book (vi) Client margin collection details (vii) Ledgers (viii) Journals (ix) Cash book 	Transaction date

Record	Reference Date
<p>(x) Bank account statement</p> <p>Such other books of accounts and documents as may be specified by the Board from time to time</p>	
<p>As an Assessee, shall maintain the following if engaged in an international transaction (where the aggregate value in the books of account, of international transactions exceeds one crore rupees) or specified domestic transaction under Income Tax Act, 1961:</p> <ul style="list-style-type: none"> (i) A description of the ownership structure of the assessee enterprise with details of shares or other ownership interest held therein by other enterprises (ii) A profile of the multinational group of which the assessee enterprise is a part along with the name, address, legal status and country of tax residence of each of the enterprises comprised in the group with whom international transactions [<i>or specified domestic transactions, as the case may be,</i>] have been entered into by the assessee, and ownership linkages among them (iii) A broad description of the business of the assessee and the industry in which the assessee operates, and of the business of the associated enterprises with whom the assessee has transacted (iv) The nature and terms (including prices) of international transactions [<i>or specified domestic transactions</i>] entered into with each associated enterprise, details of property transferred or services provided and the quantum and the value of each such transaction or class of such transaction (v) A description of the functions performed, risks assumed and assets employed or to be employed by the assessee and by the associated enterprises involved in the international transaction [<i>or the specified domestic transaction</i>] (vi) A record of the economic and market analyses, forecasts, budgets or any other financial estimates prepared by the assessee for the business as a whole and for each division or product separately, which may 	<p>End of the relevant assessment year</p>

Record	Reference Date
<p>have a bearing on the international transactions [<i>or the specified domestic transactions</i>] entered into by the assessee</p> <p>(vii) A record of uncontrolled transactions taken into account for analysing their comparability with the international transactions [<i>or the specified domestic transactions</i>] entered into, including a record of the nature, terms and conditions relating to any uncontrolled transaction with third parties which may be of relevance to the pricing of the international transactions [<i>or specified domestic transactions, as the case may be</i>]</p> <p>(viii) A record of the analysis performed to evaluate comparability of uncontrolled transactions with the relevant international transaction [<i>or specified domestic transaction</i>]</p> <p>(ix) A description of the methods considered for determining the arm's length price in relation to each international transaction [<i>or specified domestic transaction</i>] or class of transaction, the method selected as the most appropriate method along with explanations as to why such method was so selected, and how such method was applied in each case</p> <p>(x) A record of the actual working carried out for determining the arm's length price, including details of the comparable data and financial information used in applying the most appropriate method, and adjustments, if any, which were made to account for differences between the international transaction [<i>or the specified domestic transaction</i>] and the comparable uncontrolled transactions, or between the enterprises entering into such transactions</p> <p>(xi) The assumptions, policies and price negotiations, if any, which have critically affected the determination of the arm's length price</p> <p>(xii) Details of the adjustments, if any, made to transfer prices to align them with arm's length prices determined under these rules and consequent adjustment made to the total income for tax purposes</p>	

Record	Reference Date
Any other information, data or document, including information or data relating to the associated enterprise, which may be relevant for determination of the arm's length price	
Inventories prepared in respect of articles in safe custody and safety locker and nomination forms	Current Calendar year
Business Contracts/ agreements	Date of execution
ROC Filings	Date of filing
Output data in accordance with Electronic Clearing Service (Credit/Debit) Procedural Guidelines	Transaction date
Dormant account registers	End of transaction
Balancing registers	End of transaction
Safe and furniture register	End of transaction
Premises and building register	End of transaction
Overdue deposit register	End of transaction
Account receivable/payment register	End of transaction
Power of attorney register	End of transaction
Stop payment instruction register	End of transaction
Letter of credit register	End of transaction
Subsidiary day books/head office memo	End of transaction
Gold loan cards	End of transaction
Postal receipts and acknowledgement receipt and acknowledgment of swift etc.	End of transaction
Files relating to claims of deceased customers	End of transaction
Files relating to break opening of lockers/vaults	End of transaction
Long form audit report	End of transaction
Charge taking reports	End of transaction
Files on unclaimed accounts	End of transaction
Files relating to income tax	End of transaction
Licenses, sanctions from RBI/Government/local bodies and the like for activities which are concluded and which are no more relevant	End of transaction
Agreements/deeds related to vacated/disposed land and buildings once used by the bank as quarters or business purpose with bills/receipts of outgoings	End of transaction

II. Group B - Records to be maintained permanently

Record
Copies of incorporation related documents
Minutes of all Board and Committee Meetings in Minutes Book
Register containing records of investments not held in company's name
Register of charges containing all charges and floating charges
Register of contracts or arrangements in which directors are interested
Register of members of the Company along with the index
Register of renewed and duplicate share certificates
Licenses and Statutory Approvals
Intellectual Property Documents
Property Records
<p>Every company shall keep at its registered office a register of its directors and key managerial personnel containing the following particulars, namely: -</p> <ul style="list-style-type: none"> (i) Director Identification Number (optional for key managerial personnel) (ii) present name and surname in full (iii) any former name or surname in full (iv) father's name, mother's name and spouse's name (if married) and surnames in full (v) date of birth (vi) residential address (present as well as permanent) (vii) nationality (including the nationality of origin, if different) (viii) occupation (ix) date of the board resolution in which the appointment was made (x) date of appointment and reappointment in the company (xi) date of cessation of office and reasons therefor (xii) office of director or key managerial personnel held or relinquished in any other body corporate (xiii) membership number of the Institute of Company Secretaries of India in case of Company Secretary, if applicable and (xiv) Permanent Account Number (mandatory for key managerial personnel if not having DIN) <p>In addition to the details of the directors or key managerial personnel, the company shall also include in the aforesaid Register the details of securities held by them in the company, its holding company, subsidiaries, subsidiaries of the company's holding company and associate companies relating to-</p> <ul style="list-style-type: none"> (i) the number, description and nominal value of securities (ii) the date of acquisition and the price or other consideration paid

Record	
(iii)	date of disposal and price and other consideration received
(iv)	cumulative balance and number of securities held after each transaction
(v)	mode of acquisition of securities
(vi)	mode of holding - physical or in dematerialized form
(vii)	whether securities have been pledged or any encumbrance has been created on the securities
Register of sweat equity shares	
Register of employee stock options	
Register of shares or other securities which have been bought back	
Employee Register	
Wage Register	
Attendance Register	
Register of Rest Days/Leave account of employees/Leave with Wages	
As a Corporate Agent, shall maintain the following:	
(i)	Know Your Client (KYC) records of the client, as required under the relevant Authority's guidelines and provisions of Prevention of Money Laundering Act
(ii)	Copy of the proposal form duly signed by the client and submitted to the insurer with ACR signed by the specified person of corporate agent
(iii)	A register containing list of clients, details of policy such as type of policy, premium amount, date of issue of the policy, charges or fees received
(iv)	A register containing details of complaints received which include name of the complainant, nature of complaint, details of policy issued/solicited and action taken thereon
(v)	A register which shall contain the name, address, telephone no, photograph, date of commencement of employment, date of leaving the service, if any, monthly remuneration paid to the specified person
(vi)	Copies of the correspondence exchanged with the Authority
(vii)	Any other record as may be specified by the Authority from time to time
In case of Accommodation bills, the underlying trade transactions should be clearly identified and a proper record thereof should be maintained at the branches conducting the bill business	
Client account opening form	
Record of documents evidencing identity of clients and beneficial owners (KYC)	

SCHEDULE 2
Record Hold Notice

Subject: **Record Hold Notice – [•]²**

Dear [•],

In relation to [•]³ ("**Subject**"), we [•]⁴ of a [•]⁵, against ICICI Bank and/or its Employees.

In light of the same, you are, with immediate effect, required to act in accordance with the Record Hold Protocol as outlined in the ICICI Bank Record Management Policy (available on [•]), which obligates you to, amongst other things:

- a. take all reasonable steps to prevent/suspend the automatic, intentional or accidental deletion, alteration, purging or destruction of any Record in relation to the Subject, either wholly or partially, received or created either prior to or post the issuance of Record Hold Notice;
- b. ensure all external communications in relation to the Subject are in writing, and where oral communication is unavoidable, ensure all such oral communication is recorded in writing;
- c. ensure retention of Records in relation to the Subject, as far as possible, in their original format/form;
- d. identify Employees who have not been issued Record Hold Notice but who should be, and communicate those names to me;
- e. [•]⁶; and

² Please mention the name of the Client/Matter/Transaction, in relation to which the Record Hold Notice is being issued.

³ Please mention the name of the Client/Matter/Transaction, in relation to which the Record Hold Notice is being issued.

⁴ Depending on the situation, please use any of the two suggested language: (a) have become aware; or (b) are anticipating the possibility

⁵ Depending on the situation, please use choose any of the following: litigation/ regulatory/ governmental/ administrative proceeding/action

⁶ Please mention any other condition that must be stipulated.

- f. comply with such other direction/condition as may be communicated to you from time to time.

Additionally, all Department Heads shall ensure that all Employees in his/her department/group (will also include Employees who are senior to the Department Head) connected or involved with the concerned Subject, is issued a Record Hold Notice.

It is clarified that, for the purpose of this Record Hold Notice, Record(s) will include any and all information, data, records and communications, in relation to the Subject, whether in electronic, paper or other form, created, received, obtained or maintained, wherever or howsoever stored, in the course of carrying out your designated duties and functions.

In the event you have any queries or concerns in regard to this Record Hold Notice, you may approach your immediate supervisor or a Senior Group Head - Legal

Please treat this notice with utmost importance. We appreciate your co-operation.

Thanks and Regards,