

TOYOTA FINANCIAL SERVICES INDIA LIMITED

Policy for Preservation of Documents

Version 2.0

I. PREAMBLE

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (hereinafter called as "The Regulations") every listed entity is required to frame a Policy on preservation of documents. This Policy inter alia provides for preservation of documents where such preservation shall be of permanent nature as also documents with specified preservation period after completion of the relevant transactions to which such document relates.

Rule 6 of the Prevention of Money Laundering (Maintenance of Records of the Nature and value of Transactions, the Procedure and Manner of Maintenance and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 (hereinafter called as "PMLA") also provides for retention of records for a specified time. The preservation of documents is also required under relevant guidelines issued by Reserve Bank of India ("RBI"), the Policy guidelines on "Know Your Customer" norms of the Company and other applicable laws and regulations.

II. INTRODUCTION

The Policy for Preservation of Document involves the systematic identification, categorization, maintenance, review, retention, retrieval and destruction of documents created in course of business.

The Policy contains guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of if no longer needed, and how the documents should be accessed or retrieved when they are needed as per the rules made under the law.

III. DEFINITIONS

1. **'Board of Directors' or 'Board'** shall mean the Board of Directors of Toyota Financial Services India Limited, as constituted from time to time.
2. **'Company'** shall mean 'Toyota Financial Services India Limited'.
3. **'Documents'** shall mean all papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers records, filed, books, tapes, 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, maintained in physical or electronic form or both and does not include multiple or identical copies.
4. **'Departmental authorized person'** shall mean head of the department/ function or any such person who is recognized / authorized by the management or department/function head.
5. **'Electronic Record(s)'** shall mean the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
6. **'Listing Regulations'** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations').

IV. OBJECTIVE

This Policy sets the standards for managing, storing and preserving documents of the Company and safe disposal and destruction of the documents.

V. ELECTRONIC / DIGITAL RECORDS

As per the Information Security Policy, each of the departments shall ensure that the confidentiality, integrity, data classification and security of information / electronic / digital records are maintained by implementing adequate information security controls to minimize risks.

VI. DOCUMENT PRESERVATION PERIOD AND MODE

Sl. No.	Nature of Document(s)	Preservation time	Preservation mode
1.	Registration Certificates	Permanent	Physical or electronic
2.	Licenses & Statutory Approvals	Permanent	Physical or electronic
3.	Intellectual rights related documents	Permanent	Physical or Electronic
4.	Statutory Registers required under applicable laws	Permanent	Physical
5.	Audited financial statements	Permanent	Physical
6.	Minutes of General Meeting	Permanent	Physical
7.	Minutes of Board Meeting	Permanent	Physical
8.	Minutes of Committees of the Board (i.e., Audit Committee, Nomination and Remuneration Committee, Corporate Social Responsibility Committee, Information Technology Strategy Committee, Risk Management Committee, Stakeholder Relationship Committee and Meetings of various other regulatory mandated Committees such as Credit Committee, Customer Service Committee, Asset Liability Management Committee etc.	Permanent	Physical
9.	All documents related to transfer, transmission of shares/ bonds etc.	Permanent	Physical or Electronic
10.	Capital raising related documents	Permanent	Physical or Electronic
11.	Title Deeds of Properties owned by the Company and Lease Deeds including Plans/ Drawings/ Sketches including approved by various Statutory Organizations Review Reports, including that of the Customers held as a collateral.	Permanent	Physical
12.	Policies - Statutory Policies	Permanent	Physical or Electronic
13.	Material Agreements / Contracts	Permanent	Physical or Electronic
14.	Orders issued by Courts / Statutory bodies	Permanent	Physical or Electronic
15.	Investment Documents / proofs including certificates etc.	Permanent	Physical or Electronic

Sl. No.	Nature of Document(s)	Preservation time	Preservation mode
16.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.	Permanent	Physical or Electronic
17.	Power of Attorney / Delegation of Authority	Permanent	Physical or Electronic
18.	Retirement and Pension Records	Permanent	Physical or Electronic
19.	Legal Memoranda and Opinions	Permanent	Physical or Electronic
20.	Files & Register related to Fraud Cases	Permanent	Physical or Electronic
21.	Common Seal	Permanent	Physical
22.	Records on CSR Projects (including amount budgeted, spent and balance, if any) projects undertaken and progress thereon	Permanent	Physical or Electronic
23.	RBI Inspection Reports/Notes	Permanent	Physical or Electronic
24.	KYC documents / Account opening forms / documents related to customer / beneficial owners' identification and address proof / related (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
25.	Video- CIP recordings & Digital on-boarding logs & records and KYC Records obtained from the Customers & activity log and credentials of the officials performing the V-CIP/ Digital Onboarding (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Electronic
26.	Records of transactions (vouchers, cheques, and other transaction related communication etc.) of the Customers (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
27.	STR, CTR, CCR etc. and all other Returns, Forms, Filings, correspondence with FIU-IND, ED, RBI, IRDAI & Advisories by FIU-IND & RBI (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
28.	All reports/ notice/ penalty/ correspondence received from the regulator/ replies submitted to the regulator for the above reports	Ten Years	Physical or Electronic
29.	Records relating to outsourcing of Activities to Third Party Vendors /Outside agencies	Ten Years	Physical or Electronic
30.	Court case files from the date of disposal	Ten Years	Physical or Electronic

Sl. No.	Nature of Document(s)	Preservation time	Preservation mode
31.	Loan Agreements and applications (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
32.	Files on Unclaimed refunds, excess credits etc. (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
33.	Welcome Kit Issue Register	Ten Years	Physical or Electronic
34.	NOC Issue Register	Ten Years	Physical or Electronic
35.	Complaints received through various channels from customers	Ten Years	Physical or Electronic
36.	Call recordings of calls made to the customers (Customer Service Team & Collections)	Ten Years	Electronic
37.	Audit trails of digital signatures executed by the Company and with its customers and partners	Ten Years	Electronic
38.	RC and Invoice records of the customers (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
39.	Credit documents / proposals (from the date of cessation of transaction relationship between Company and the customer)	Ten Years	Physical or Electronic
40.	Non-Disclosure Agreements, Service Level Agreements, Master Service Agreements and other agreements executed by the Company (from the date of cessation of relationship between Company and the vendor)	Ten Years	Physical or Electronic
41.	Office copies of Notices, Agendas, Notes to Agenda and other related papers of board and Committee Meetings	Eight Years	Physical or Electronic
42.	Minutes of non-statutory/special Meetings	Eight years	Physical or Electronic
43.	Books of Accounts including vouchers, claims, bills etc.	Eight Years	Physical or Electronic
44.	Annual Return(s) and copies of all certificates and documents required to be annexed thereto	Eight Years	Physical or Electronic
45.	Personnel/ Employee Documents (after termination of service of employment)	Eight Years	Physical or Electronic
46.	Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers (after termination of service of employment)	Eight Years	Physical or Electronic

Sl. No.	Nature of Document(s)	Preservation time	Preservation mode
47.	Insurance Policies/ various policies Claims	Eight Years	Physical or Electronic
48.	Correspondences with Regulatory authorities /stakeholders	Eight Years	Physical or Electronic
49.	Declarations, disclosures and certificates given by Directors and Key Managerial Personnel	Eight Years	Physical or Electronic
50.	Non-Statutory Registers/Documents	Eight Years	Physical or Electronic
51.	Treasury related documents such as forex hedging and all treasury related activities.	Eight Years	Physical or Electronic
52.	<p>Taxation (Direct or Indirect tax) documents include, but not limited to documents concerning tax filings, tax returns, tax audits & certifications, transaction records including records of proof of deductions, tax assessments, tax litigations including appeals and petitions preferred against any claim made by the relevant tax authorities.</p> <p>In addition to the retention period specified, records relating to litigation matters are to be kept till the cases are finally disposed off and maintained as per Court case related retention Period.</p>	Eight Years	Physical or Electronic
53.	The Instrument creating a charge or modification	Eight Years	Physical or Electronic
54.	Return of declaration in respect of beneficial interest in any share	Eight Years	Physical or Electronic
55.	Copy of newspaper advertisement or publications	Eight Years	Physical or Electronic
56.	Attendance registers of Board and Committee Meetings	Eight Years	Physical or Electronic
57.	Structured digital database maintained as per SEBI (Prohibition of Insider Trading Regulations) 2015	Eight Years	Electronic
58.	Employee Training Records (from the date of training)	Eight Years	Physical or Electronic
59.	Compliance checklists / CMT records / test checking / risk assessment records	Eight Years	Physical or Electronic
60.	Copy of returns, documents and intimations regarding events disclosed to Stock Exchange under SEBI (LODR) Regulations 2015	Five Years	Physical or Electronic
61.	Interdepartmental correspondence	Five Years	Physical or Electronic
62.	Papers relating to SEBI Complaints Redress System (SCORES)	Five Years	Physical or Electronic
63.	Management Audit/ Vendor Audit and audit other than regulator and its replies	Five Years	Physical or Electronic
64.	Marketing and Sales related documents	Five Years	Physical or Electronic

Sl. No.	Nature of Document(s)	Preservation time	Preservation mode
65.	Press releases including any intimation given to the press regarding financial results, profits, meetings of the Board, general meetings, and overall performance of the Company	Five Years	Physical or Electronic
66.	Tape recording or other electronic recording mechanism used for Board Meeting held through video conferencing or audio-visual means	At least upto the completion of audit of that particular year.	Electronic
67.	Courier Register/ POD Slips	3 Years	Physical or Electronic
68.	If there is no legislative provision and not referred in this table shall be maintained for a period of 8 (Eight) years	Eight Years	Physical or Electronic
69.	Any other documents necessary to be maintained as per statutory requirement.	Ten Years	Physical or Electronic
70.	Rejected borrowers & Approved but not disbursed borrowers KYC documents / Account opening forms / documents related to customer / beneficial owners' identification and address proof / related (from the date of cessation of transaction relationship between Company and the customer)	Six Months Five Years	Physical & Electronic KYC and other documents (6 Months) Customer data for Dedupe purposes (5 years)

Note:

1. Documents preserved shall include modification, amendments, additions into such documents. The Documents shall be preserved for specific time period as mentioned in this Policy.
2. Preservation of Document in Electronic mode shall be in accordance with the Back-up and restoration Policy of the Company and Vaulting process.
3. If there is a conflict between this Policy and any other Policy of the Company or any laws or regulations, then the latter shall prevail.

VII. ROLES & RESPONSIBILITIES

The respective Departmental authorized person 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.

VIII. 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.

IX. SUSPENSION OF RECORDS DISPOSAL IN THE EVENT OF LITIGATION/CLAIMS

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice / Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of.

X. DESTRUCTION OF DOCUMENTS

The Company shall maintain a register of preservation and disposal of records after the expiry of the statutory retention period. The register of disposal shall be maintained at department level in format in Annexure-1.

This applies to both Physical and Electronic Documents. For disposal of electronic Policy refer to Data classification Policy and back up and restoration Policy.

The destruction of documents shall be handled as per the Procedure laid down in “Information Security Policy” and “Information Technology Policy” of the Company.

XI. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be posted on the Intranet and the website of the Company.

XII. AMENDMENTS

The Board may, subject to the applicable laws, amend any provision(s) or substitute any of the provisions(s) or replace this Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

XIII. ANNEXURE 1

Specimen format of the register of documents disposed / destroyed

Particulars of document along with provision of law	Date and mode of destruction	Initials of person in charge	Initials of Departmental authorized person