

NISSAN RENAULT FINANCIAL SERVICES INDIA PRIVATE LIMITED

1. Introduction

Nissan Renault Financial Services India Private Limited (NRFSI) ("Company"), is committed to adhere to regulatory and statutory requirement on record maintenance, preservation and reporting of information in a manner that allows data to be retrieved easily and quickly whenever requested by competent authorities.

2. PURPOSE:

Record retention and maintenance is concerned with the selection, classification, storage, retrieval and timely destruction of information. This requires a structured approach in order to comply with the applicable laws and regulations and to meet business needs.

The purpose for this policy is to establish the requirements to ensure that necessary records and documents of are adequately retained, maintained and destruction is as per the procedure laid out in the policy

3. OBJECTIVE:

The objective of the Policy is to ensure that all important documents, generated or received by NRFSI, are maintained and preserved in compliance with the applicable statutory provisions and to facilitate destruction of documents that are no longer required, at an appropriate time in specified manner.

4. APPLICABILITY:

This policy is applicable to all documents that include physical records maintained in the form of files/registers/books or in the electronic form.

5. DEFINITION OF DOCUMENTS:

"Documents" refer to all records that include papers, files, registers, agreements, circulars, judgments, orders, approvals, registration certificates, security cheques, KYC documents, customer documents, policy/process documents etc. generated or received or maintained by NRFSI during its business either in physical form or in electronic form.

6. ROLES AND RESPONSIBILITIES:

The individual departments shall be responsible for record keeping and retention of all documents and records like files, letters, registers, slips, office memos, manuals, internal approvals, vouchers etc. relating to their respective department.

There must be a clear allocation of responsibility within each department to assist with the management of records. All records should have an identified owner responsible for their management.

7. DOCUMENT RETENTION SCHEDULE:

The documents/records shall always be preserved for a period in accordance with the statutory requirements, prescribed act or any law applicable to them from time to time.

The detailed (indicative list) Record Retention Schedule as per **Annexure A** lays down the type of documents maintained, retention period. Any changes in the Schedule can be made with the approval of the Management committee.

Documents not covered under the schedule shall be preserved for a period as prescribed under the relevant statute. In case of absence of such provisions therein, such documents shall be preserved for a minimum period of ten years immediately after the financial year to which it pertains.

8. SUSPENSION OF RECORD RETENTION IN EVENT OF LITIGATION OR CLAIMS:

In the event of commencement of any litigation against or concerning the organisation or when litigation can be anticipated or fraud investigation has commenced, all documents relating to the customer/staff or transaction or period should be immediately moved/copied from storage and kept in the exclusive custody and supervision of the functional head handling the legal or fraud proceedings.

Any further disposal of documents shall be suspended until such time the advice of the legal department/counsel, determines otherwise. This suspension shall apply to all records pertinent to a case or anything likely to lead to the discovery of admissible evidence.

9. DESTRUCTION OF RECORDS :

- Individual department must ensure that records must not be destroyed before the prescribed retention period.
- The physical records are to be disposed of by respective department in following way:
 - Shredding or otherwise making unreadable confidential records or by fire in accordance with applicable laws.
- The electronic records are to be disposed of in the following ways:
 - All electronic records must be disposed of in a responsible and compliant manner by the IT department with prior approval from respective departmental heads/ respective DOA.
 - Records that have been disposed of through overwriting, sanitization written disposition certificate as proof that disposal has taken place.
- The respective Departmental heads shall maintain a register containing the details of documents destroyed along with the date of destruction with the approval of the competent authority as per DOA Company Secretary (CS) or Chief Financial officer (CFO) or other officer or person as decided by the Board) as per Annexure B in the presence of the respective department HOD/any other person authorised by respective department HOD.
 - The destruction of document shall be carried out in totality and not partially.
 - Confirmation of destruction to be presented to the Management committee for noting the same.

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ANNEXURE A & B:



Annexure - Record
retention - Version 1