

Financial Benchmarks India Pvt. Ltd.

Documents Retention Policy

27th September, 2017

Version 1

Introduction:

1.1 The FBIL has been set up as a company to administer benchmarks pertaining to interest rates and foreign exchange rates. The FBIL has been publishing benchmarks on a daily basis on Overnight MIBOR, Certificate of Deposit and T-Bill rates based on traded data and Term MIBOR and FC-Rupee Options Volatility Matrix based on polled submissions by identified submitters.

1.2 As a benchmark administrator, FBIL is required to comply with the extant guidelines of the regulatory authorities as also the international best practices since its benchmarks are intended for use by a wide variety stakeholders. In terms of IOSCO principles, a benchmark administrator is required to put in place a policy for retention of its written records.

1.3 The paragraph 5.10 (xxi) of RBI Committee Report on Financial Benchmarks states that the Administrator may retain all the records relating to benchmark determination, including market data /submissions/ any other data / expert judgment relied upon for benchmark determination, changes in standard procedures, and methodologies during period of market stress, names and roles of personnel responsible for submissions, declaration of conflicts of interest, findings of internal/external audits and remedial action taken thereof, for a minimum period of eight years.

1.4 Paragraph 5.11 (vi) of the report *ibid* mandates retention of written records by the Calculating Agent [CA] where the calculation work is outsourced to the CA. This forms part of the Governance framework for the CA.

2. Purpose:

2.1 It provides protection to FBIL and its staff against any future/ potential disputes involving its normal business operations. The retention of records is a risk management tool as it preserves the essential audit trail of all events relating to the determination and publication of all benchmark data.

3. Applicability:

3.1 This policy will apply not only to physical records but also to electronic files and emails created by FBIL in its normal course of business as benchmark administrator. The policy prescribes the preservation period for various documents following the international best practices and as provided in the RBI Committee Report on Financial Benchmarks. This policy will apply only to FBIL as the benchmark administrator and not to the CA who will be guided by the relevant provisions of the aforesaid Report on Financial Benchmarks.

4. Documents to be retained:

4.1 The FBIL deals with the following types of documents in its day-to-day operations for which the preservation period is defined. Matters relating to Board

- i. Matters relating to OC
- ii. Financial statements
- iii. Statutory audit reports
- iv. Management audit reports
- v. Audit reports on benchmark calculation by CA
- vi. Compliance to audit reports
- vii. Tax Returns and Tax audit Report
- viii. Selection of submitters' panel
- ix. Methodology documents
- x. Conflicts of interest declarations
- xi. Whistleblowing reports
- xii. Complaints
- xiii. Closure reports in respect of Complaints and Whistleblowing reports

5. Period of retention:

5.1 The detailed preservation period for these documents is indicated in the Annex. This will be applicable to both physical records and records maintained in electronic format. All emails will be preserved for at least three years.

5.2 All documents will be examined annually with regard to their preservation period and documents past the prescribed preservation period will be destroyed with the approval of the CEO.

6. Review:

6.1 The document retention policy shall be reviewed annually or at such periodicity as the Board may decide.

Retention Period of Documents

Annex 1

Sl. No.	Description of Documents	Retention period
1	Agenda items of Board meetings	5 years
2	Minutes of Board proceedings	Permanent
3	Agenda items for Annual General Meeting	5 years
4	Minutes of AGM Meeting	Permanent
5	Annual financial statements	Permanent
6	Agenda items of Oversight Committee	5 years
7	Minutes of Oversight Committee	Permanent
8	Policy Circulars	Permanent
9	Press Release	8 years
10	Concept paper on product development	Permanent

11	Technical document for computation of benchmarks	Permanent
12	Market data for submission	8 years
13	List of Panel of submitters	8 years
14	Declaration of Conflicts of interest	8 years
15	Monthly FBIL Audit report of CA activity	8 years
16	Compliance report of CA	8 years
17	Monthly Audit Report of CA submitted by CA's auditors	8 years
18	Compliance Report of CA	8 years
19	Management Audit Report	8 years
20	Compliance Report of Management Audit	8 years
21	Whistleblowing Officers Report	8 years
22	Complaint and its Closure Report	8 years
23	Tax Returns and Tax Audit reports	8 years