

# **RHC HOLDING PRIVATE LIMITED**

## **Policy for Preservation of Documents**

**Type : Policy**  
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## Policy for Preservation of Documents

### 1. INTRODUCTION

Records play a very significant role in the functioning of any Company. They provide information about the past events and aid managerial decision making. An established system of maintenance of records is very important for efficient functioning of any Organization. Proper preservation and retrieval of records helps to expedite the process of referring, action and decision making.

### 2. OBJECTIVE

A Document Preservation Policy identifies documents that need to be maintained and lays down guidelines for how long certain documents should be kept. The Policy brings about economy in office management and efficiency in office performance, improves house-keeping and the ambience of the office.

Further, a Document Preservation Policy is necessitated:

- (i) To comply with legal duties and requirements, either statutory or regulatory;
- (ii) To avoid inadvertent destruction or alteration of documents;
- (iii) To support or oppose a position in an investigation/ litigation;
- (iv) To protect from unnecessary expense and time during discovery and re-discovery, and
- (v) To keep the important documents confidential.

### 3. LEGAL FRAMEWORK

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.<sup>1</sup>

### 4. APPLICABILITY

This Policy is applicable on RHC Holding Private Limited.

### 5. SCOPE

This Policy aims at providing the guidelines on preservation of Documents of all the Functional departments. It applies to all official documents (physical / electronic) generated in the course of the Company's operations.

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<sup>1</sup> "The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions: Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode."

## 6. POLICY ON PRESERVATION OF DOCUMENTS

RHC endeavors to preserve all its Documents under the following criteria:

- (A) **Permanent Records**: Such records as so identified, shall be maintained permanently in the archives of the Company, and include such Document which:
- (a) evidences a statutory license/approval/sanction/permission/registration;
  - (b) represents a title to an immovable property or an intellectual property;
  - (c) lays down the terms and conditions regarding operation and management of hospitals;
  - (d) is a registration under a statute which is one time in nature;
  - (e) evidences the terms at which money has been borrowed or lent;
  - (f) governs purchase of shares/investments in an entity;
  - (g) is a constitutional document;
  - (h) is a record of statutory meetings/proceedings; and
  - (i) is of significant importance in case of a dispute with third parties involving material amounts.
- (B) **Records maintained for at least 8 (Eight) years** which have been so decided to be preserved by the Function Heads, either under their own respective judgement or as required to be preserved by any specific Law.
- (C) **Other Functional Documents / Records**, which are of routine nature and as may be categorized as such by the Function Heads.

## 7. MANNER OF PRESERVATION OF RECORDS

Where permitted by law, any Record or Document that has originated in physical form may be converted to electronic form and preserved electronically if more convenient. The Documents shall be preserved in Office Cabinets in lock & key under the supervision on an official so authorized by the Functional Head.

## 8. MANNER OF DESTRUCTION OF RECORDS

- (a) No records shall be destroyed without being reviewed and recorded. The list prepared for disposal must be retained in the office of Functional Head and Administration Head for records after the disposal of the records.
- (b) Physical Records shall be disposed off by controlled burning / shredding in shredder under the supervision of Functional Head and Administration Head.
- (c) Electronic data preserved on servers and hard drives shall be deleted and overwritten. Electronic data contained on all other media shall be destroyed by the physical destruction of that media.

## 9. ADMINISTRATION

- (a) No officer, director or employee of the Company shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case.
- (b) The documents related to any dispute/legal/arbitration/court cases etc., are to be preserved till final disposal of the case and must be disposed only after getting the clearance from the Legal Department.
- (c) Wherever the period of preservation recommended and the period of preservation mentioned in other statutes is conflicting, the higher period shall be considered for preservation.
- (d) Primarily the responsibility for preservation of records shall rest with respective Functional Heads unless otherwise specified exclusively and such Functional Head shall be the clarifying Authority in case of any point of interpretation.

#### **10. SUSPENSION OF RECORD DISPOSAL IN EVENT OF LITIGATION OR CLAIMS**

In the event the Company reasonably anticipates or becomes aware of any governmental investigation / inquiry or audit concerning the Company or the commencement of any litigation against or concerning the Company, any further disposal of documents shall be suspended until such time as deemed necessary.

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