

KOVAI MEDICAL CENTER AND HOSPITAL LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

(As approved by the Board on 7.11.2015)

1. **Purpose and Scope**

The purpose of this documents to present a policy statement for Kovai Medical Center And Hospital Limited (“**KMCH**”) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”) and any other applicable statutory requirements.

The policy is intended to define KMCH’s policy on preservation of documents, responsibilities of departments in respect of such preservation and to provide guidance to the executives and staffs working in KMCH in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for transparency in document preservation and retrieval system of KMCH as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents of identified departments received or created in the course of business. Appendix to the policy provides the types of records to be preserved, departments who are responsible for the same, on how long certain documents should be retained, and when those documents should be disposed of, if no longer needed and the appendix to this policy is inclusive but not exhaustive.

This policy has been adopted and approved by the Board of Directors at its meeting held on 7.11.2015.

2. **Statutory Mandate**

The policy on preservation of documents and archival is mandated by the provisions of Regulation 9 of Chapter III of LODR. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources. Further Regulation 30(8) of Chapter IV of the LODR requires an Archival Policy to be put in place for archiving disclosures made under the said Regulation.

3. **Classification of Documents to be preserved / retained**

Based on the recommendation of the management of the Company, the Board of Directors have classified the following documents to be retained and preserved for posterity.

- *Documents that need to be preserved / retained permanently*
- *Documents that may be preserved / retained for a period of 8 years*
- *Documents to be preserved electronically and archived when necessary*

4. Disclosures on website and Archival policy

Company shall ensure that all events or information that has been disclosed to the stock exchange(s) under regulation 30 of Listing Regulations shall be hosted on the company's website for a period of 5 years and thereafter archived for three years.

5. Responsibility of Employees for Preservation of Documents

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area of work. Such policy bestowing responsibility on the Company's employees would immensely help company's response to any notice or query or inspection or audit from any regulator or statutory authority or auditor or as a litigation preparedness tool helping the Company's and other legal counsel to track down documents to handle the notices, query, clarification, audit, inspection from any quarter or to fight and represent in legal cases.

6. Archiving of Documents

Documents which are classified as Permanent shall be archived in electronic form and maintained by the respective Departments who are responsible in preservation of the same. The physical original documents relating thereto shall be preserved under lock key of the officer in charge of the respective Departments. Documents other than marked as Permanent shall be archived in electronic form and maintained by the respective Departments who are responsible in preservation of the same. Upon such electronic archiving of the same the physical documents thereto can be destroyed under the supervision of the officer in charge of the respective Departments.

7. Periodical Review of the Policy by Top Management

The Policy should be complied with by all levels of employees. The policy should be reviewed periodically by the Top Management and proposed amendments in the policy shall be placed before the Board. The Top management shall also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

Top Management under this policy means Key Managerial Personnel, Executive Directors, Dean, Vice Presidents and functional department heads.

8. This policy was approved by the Board of Directors at its meeting held on 7.11.2015.

APPENDIX

1. Accounting and Finance records including Annual Financial statement

Record Category	Period for Preservation
Accounts Payable ledgers and schedules	8 Years
Accounts Receivable ledgers and schedules	8 Years
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit
Annual Plans and Budgets	3 years after the budget year is closed
Bank Statement and Cancelled Cheques	8 years
Employee Expense Reports	8 years
General Ledger	8 years
Interim Financial Statements	8 years
Notes Receivable ledgers and schedules	8 years
Investment Records	Permanent
Security deposit receipt copies	3 years after termination of the contract
Financial Statements, Other books of account, documents, records and registers	8 years

2. Insurance Records

Record Category	Period for Preservation
Annual Loss Summaries	8 Years
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent
Group Insurance Plans – Active Employees	8 years
Group Insurance Plans - Retirees	Permanent
Insurance Policies for the Company	Permanent
Journal Entry Support Data	8 years
Releases and Settlements	Permanent

3. Tax records

Record Category	Period for Preservation
Tax-Exemption Documents and related correspondence	Permanent
Payroll Tax records	8 years
Tax Bills, Receipts, Statements	8 years
Tax Returns – Income, Franchise, Property	Permanent
Tax work paper packages - Originals	8 years
Sales Tax / VAT Records	8 years
Annual Information Returns – State and Central	Permanent
Service Tax Records	8 years

Responsibility for 1 to 3: FINANCE AND ACCOUNTS DEPARTMENT

4. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.

Record Category	Period for Preservation
Corporate Records (certificate of incorporation, commencement of business, Certificate of registration from statutory authorities and other business related registrations, permissions, licenses, listing agreement, common seal, minutes book of general meetings, postal ballot, board meetings and meetings of committees thereof, Memorandum and Articles of Association, Annual Reports and other statutory approvals and statutory correspondence	Permanent
Share Transfer Forms, Share Certificates, statutory registers, Attendance Registers of Board, committees of Board	Permanent
ROC Filings and Stock Exchange filings in physical and Electronic form	8 years from the date of filing
Annual Audit Reports and Financial Statements	Permanent
Secretarial Audit Reports	8 years
Board Agenda Papers	5 years
Minutes of the Board Meetings, its committees, share holders, creditors	Permanent
Statutory Registers and records	Permanent
Disclosures made under Regulation 30 of the LODR on the website and to the stock exchanges	3 years after the expiry of initial period of 5 years of disclosure on website

Responsibility: SECRETARIAL DEPARTMENT

5. Legal Files and Records

Record Category	Period for Preservation
Opinions	Permanent
Litigation files	5 year after expiration of disposal of the case
Court Orders	Permanent

Responsibility: LEGAL DEPARTMENT

6. Property Records

Record Category	Period for Preservation
Property Deeds, Assessments, Licenses	Permanent
Purchase / Sale Deeds	Permanent
Lease Agreements	3 years after expiration of the lease
Property tax, water and electricity cess and related documents and correspondence	Permanent
Licenses, approvals and permissions under various laws applicable to the business of the company	Permanent

Responsibility: LEGAL DEPARTMENT

7. Electronic Documents including email back up

All e-mails – from internal and external sources to be retained upto 24 months from respective date of receipts.

Responsibility: IT DEPARTMENT
