



Policy for Preservation of Documents

Type : Policy
Effective Date: December 4, 2015
Communication Plan: Web/Intranet

Owner: Board of Directors
Review Schedule: Annual / Need Based
Privacy Classification: Open General
Version: 5.0

Custodian: Compliance Officer
Latest Reviewed: Aug 13, 2021
Doc. No. FHL/PPD/Aug2021

FORTIS HEALTHCARE LIMITED

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, 2015.¹

4. APPLICABILITY

This Policy is applicable on Fortis Healthcare Limited and its subsidiaries.

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/on the website(s)) generated in the course of the Company's operations.

¹ "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

Fortis 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

The Documents covered under Category (A) and (B) above shall be preserved in **Central Documents Repository** and shall be dealt with in line with **Document Management System²** Protocols.

The Documents covered under Category (C) above shall be preserved in Office Cabinets in lock & key under the supervision of an official so authorized by the Function 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.

² Please refer Annexure A for a brief note on Document Management System

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.

----XXX----

Document Management System

Document Management System is the dual system whereunder the physical documents are preserved at one single location and their images, stored electronically, are made accessible to multiple people simultaneously at multiple locations. The DMS is set up for proper upkeep and maintenance of original physical documents that are deposited with it for their retrieval at any point in time and further to provide real time digital access thereto.

Thus, DMS has two constituents:

- A. Central Documents Repository - Maintenance of physical documents; and
- B. Virtual Data Room - Facilitate access and retrieval of documents electronically to the Users through web-based search module.

The documents so deposited are kept fully secured in the Fire Proof Cabinets. The ownership of the Documents rests with the respective Function Heads. The documents so deposited, are made available to the nominated Documents Champions electronically through an online DMS software. The Document Champions are provided training on the procedure of deposit, access and release of the Documents to/from CDR.

Preservation of Documents at DMS provides the following benefits:

- Prevents accidental / inadvertent destruction / loss or misplacement of the Company's records that need to be preserved.
- Enables suitable conversion of physical documents to digital mode so as to be make them readily available to end-users.
- Promotes smooth retrieval of file / records without wasting time for physical documents.
- Promotes improved record management practices and create greater organizational and systems efficiencies.
- Facilitates Control through centralization of documents and providing online access with rights management for security purpose.
- As a legal entity, all relationships between the Company and others persist through contracts (oral and written) and as for high impact or high value engagements, a written contract is preferred, the ability to manage such contracts becomes imperative to ensure adherence to obligations and monitoring value delivery. Further, financial controls require that release of payments is backed by contracts and management controls also need contracts to assess operational efficiency (vendors delivering to SLA committed under contracts). All of which require Document Management Systems, Process and Frameworks to be agreed and followed.