

**Indraprastha Medical Corporation Limited**  
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**POLICY FOR PRESERVATION OF DOCUMENTS**

**Effective Date:- 3<sup>rd</sup> November, 2015**

**Amended on :- 3<sup>rd</sup> February, 2020**

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1. **Preface**

Pursuant to regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 every listed entity is required to formulate and put in place a policy for preservation of documents. Accordingly, the board of directors of Indraprastha Medical Corporation Limited has approved the following Policy for preservation of Documents /Records maintained by the Company.

2. **Definitions**

(A) "Administrator"

Administrator shall mean the Managing Director of the Company for the purposes of this Policy

(B) "Board of Directors" or "Board"

Board of Directors or Board shall mean the Board of Directors of Indraprastha Medical Corporation Limited, as constituted from time to time.

(C) "Company"

Company shall mean "Indraprastha Medical Corporation Limited".

(D) "Documents"

Documents shall include all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

(E) "Listing Regulations"

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

(F) "Policy" means this Policy for Preservation of Documents and as may be amended from time to time

3. **Purpose of the Policy**

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately managed, stored, protected and preserved as per the statutory

requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

#### **4. Administration**

Attached as Appendix A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode.

The Managing Director of the Company shall be the Administrator and he shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

#### **5. Roles & Responsibilities**

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy under the overall supervision of the Administrator.

#### **6. Procedure for disposal of Documents**

The Documents of the Company which are no longer required as per the time schedule prescribed in the Appendix A may be destroyed.

The Administrator may direct respective Departmental Heads or Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. Notwithstanding the aforesaid, the approval from board of directors of the Company shall be obtained to destroy any Documents wherever required as per the applicable law.

The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at Appendix B.

Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

#### **7. Suspension of Documents disposal in the event of Litigation or Claims**

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

**8. Communication of this Policy**

For all new employees and directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies.

For all existing employees and directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

**9. Scope and Limitation**

In the event of any conflict between the provisions of this Policy and the Listing Regulations, Companies Act, 2013, or any other statutory enactments then the provisions of such Listing Regulations, Companies Act, 2013 or statutory enactments shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

**10. Amendment**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

**For and on behalf of the Board**



**P. Shivakumar  
Managing Director**

**Place : New Delhi**

**Date : 3<sup>rd</sup> February, 2020**



## **APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE**

The Documents Preservation Schedule is organised as follows:

Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records
- K. Medical Records

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### A. Corporate Records

Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Common Seal	Permanent
2.	Certificate of Incorporation and subsequent changes thereto	Permanent
3.	Memorandum and Articles of Association of the Company	Permanent
4.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
5.	Statutory Registers	Permanent
6.	License and Permissions	Permanent
7.	Statutory Forms except for routine compliance	Permanent
8.	Scrutinizers Reports	Permanent
9.	Register of Members	Permanent
10.	Index of Members	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
11.	Annual Returns and other Forms filed with MCA	8 years from the filing with the Ministry of Corporate Affairs
12.	Board Agenda and supporting documents	8 years
13.	Attendance Register	8 Years
14.	Office copies of Notice of General Meeting and related papers	8 Years
15.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years
16.	Instrument creating a charge	8 Years
<b>Miscellaneous</b>		
17.	Books and documents relating to issue of share certificate, including blank forms of share certificates.	30 years (permanently in case of disputed cases)
18.	Certificates surrendered to the company	3 years from the date of surrender
19.	Register of Debenture-holders, if any	15 years after the redemption of debentures
20.	Index of debenture-holders, if any	15 years after the redemption of debentures
<b>B: Accounts and Finance</b>		
Sr. No.	Record Type	Preservation period

Documents to be retained permanently		
1	Annual Audit Reports and Financial Statements	Permanent
2	Subsidiary Accounts	Permanent
3	Internal/Cost audit Reports	Permanent
4	Compliance/Secretarial Audit Report	Permanent
Documents to be retained for a minimum period of 8 years		
5	Annual Plans and Budgets	8 years after completion of Audit
6	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
7	Bank Statements	8 years
8	Investment Records	8 years
9	RBI Returns	8 years
10	Foreign Trade documents	8 years

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<b>Miscellaneous</b>		
9	General Correspondence	3 years
<b>C: Tax Records</b>		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent
2	Tax Bills, receipts and payments	Permanent
Documents to be retained for a minimum period of 8 years		
3	Excise/Customs Records	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
4	Tax Deducted at Source Records	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
5	Income Tax papers	8 years from the end of the Financial Year or completion of assessment under Income Tax whichever is later
6	Service Tax papers	8 years from the end of the Financial Year or completion of assessment under Service Tax whichever is later
7	VAT / CST / State Sales Tax	8 years from the end of the Financial Year or completion of relevant assessment whichever is later
<b>D: Legal Files and Records</b>		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Court Orders	Permanent
2	Business / JV/SPA/Loan/Lease Agreements	Permanent
3	Trade Mark /Copy Rights/Patents	Permanent
Documents to be retained for a minimum period of 8 years		
4	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of tenure/contracts
Miscellaneous		
5	Legal Memoranda and Opinions including subject matter files	3 years after the close of the matter
6	Litigation files	3 year after close of the Litigations
<b>E: Property Records</b>		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement	Permanent
2	Property Card, Index II, Ownership records issued by Government Authority	Permanent

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<b>F: Project</b>		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1	Project Documents and Related correspondence (including any proposal of the Project and its approval )	Permanent
<b>G: Correspondence and Internal Memo</b>		
Sr. No.	Records Type	Preservation period
<b>Documents to be retained permanently</b>		
1	Those pertaining to non-routine matters or having significant lasting consequences	Permanent
<b>Miscellaneous</b>		
2	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> <li>• Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings;</li> <li>• Letters of general enquiry and replies that complete the cycle of correspondence;</li> </ul>	3 years
<b>H: Insurance Records</b>		
Sr. No.	Records Type	Retention period
<b>Documents to be retained permanently</b>		
1	All Insurance Policies	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
2	Journal Entry support data	8 years
3	Inspection Reports	8 years
<b>Miscellaneous</b>		
4	Claims records	Till settlement is over and claim money is received
5	Group Insurance Plans	Until plan is amended or terminated
<b>I: Personnel Records</b>		
Sr. No.	Records Type	Retention period
<b>Documents to be retained permanently</b>		
1	Payroll Registers	Permanent
2	Bonus, Gratuity and other Statutory Records	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
3	Time office Records and Leave Cards	8 years
4	Unclaimed Wages Records	8 years
5	Employees Information Records	8 years after separation
6	Statutory Returns /Reports	8 years

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Miscellaneous		
7	Employees Medical Record	3 years after separation

#### J: Electronic Records

##### 1. Electronic Mail

- All e-mails received from Internal and External Sources may be deleted after 8 years.
- Employees will strive to keep their e-mails related to business issues.
- All Emails related to business issues should be downloaded to a server or user directory on server.
- Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
- All e-mails of Employees which are important should be copied to the employees' folder.

##### 2. Web Page Files : Internet cookies

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.

The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases documents will be maintained both in paper and electronic form.

#### K: Medical Records

Sr. No.	Records Type	Retention period
<b>Documents to be retained permanently</b>		
1	License / Approvals	Permanent
2	Patient Medical Records	Permanent
<b>Documents to be retained for a minimum period of 15 years</b>		
3	Reports / Returns filed with statutory bodies	15 years
4	Statutory Registers	8 years
5	NABH, NABL Audit documents	8 years
6	JCI Audit documents	8 years
7	ACE Reports / Clinical Audit Reports / Documents	8 years
8	Medical standard records	8 years
9	Inspection Records	8 years

*In addition to the above, all documents and records of the Company, which are not specifically referred to or covered in this Policy, shall be preserved for such time period and shall be maintained in such manner ascribed under the applicable law.*

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APPENDIX – B

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Secretary or other authorised person

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