



Record Retention and Destruction Policy

The Document Management Policy (Policy) defines the rules for the retention and disposition of paper and electronic documents, video, and photographs for the U.S. based offices of Calcutta Mercy. By adhering to the policy, Calcutta Mercy can realize the following benefits:

- Ensure compliance with regulatory requirements for retaining documents
- Reduce storage cost by disposing of documents that no longer serve a business purpose
- Reduce the cost required for legal discovery and responses to inquiries

As a Calcutta Mercy employee, it is **your** responsibility to be familiar with and adhere to the Policy.

Document Management Policy

This Document Management Policy (the "Policy") establishes the procedures that all U.S.-based employees of Calcutta Mercy ("CM") must follow regarding the retention and destruction of documents and records. The primary goal of the Policy is to retain all documents and records that CM is legally required to maintain, and such other documents and records as are required for the day-to-day operation of CM's business. A secondary, but important, purpose of the Policy is to provide for an orderly process to discard unnecessary and obsolete materials in order to reduce the cost of storing and preserving these materials.

Good document management is the responsibility of every CM employee. All employees are responsible for insuring that documents maintained by them are properly identified, retained, transferred, and disposed of in accordance with this Policy. Each employee is required to become familiar with and comply fully with the Policy. This Policy applies to all kinds of documents and records (such as e-mail and documents or records stored on computer hard drives, shared drives, thumb drives, CDs, DVDs, tapes, etc.), video, and photographs.

As a matter of business practice, CM owns all documents and records created in the course of CM's business. CM has the right to review, save, or discard any such materials as it deems appropriate in order to comply with applicable law and to support our business.

Document Categories, Retention Periods and Document Management Personnel

Schedule A of this Policy specifies a limited list of business documents or records that are required to be retained, and sets forth the applicable retention periods for them. Please review this schedule and familiarize yourself with the categories of documents and records covered. Document management compliance at CM is overseen by the **Director** of Calcutta Mercy. Any questions that you may have about records management, including the proper classification of or retention period for documents, should be directed to the Director.

The Role of All CM Employees

On an ongoing basis, employees should assess whether documents or records you control continue to serve a business purpose. For materials that do not, you should close the file and discard any materials that you are not required to maintain. If a document or record is not listed on the retention schedule, it can be discarded immediately and, in any event, should not be retained for more than a maximum of one year after you are no longer using it. Discarding unnecessary documents and records within this 12-month timeframe will help control the enormous cost of retaining stale documents with no utility. If the Policy requires that you retain any document or records for a specified period of time, then you should label the file, identify the type of documents or records included, and note the appropriate retention/destruction schedule in accordance with this Policy. Ask the Director when you have questions. Additionally, as part of CM's document management practices, all CM personnel will participate in periodic "Clean-Up Activities" that will focus employees on: 1) identifying documents or records that are not required to be retained and which no longer serve a business purpose; and 2) sending to off-site storage documents or records that are required to be maintained under this Policy, but for which day-to-day access is no longer necessary. The Director will schedule and coordinate "Clean-Up Activities" at least once per calendar year. The purpose of this day is to ensure that documents are being retained and disposed of in accordance with the Document Management Policy. Employees will use this day to review the hard copy documents, emails, and electronic files maintained by each employee personally and by each business area.

Electronic Documents & Email

Each employee will be responsible for applying the Policy to electronic documents and records stored by him/her on his/her computer or device or on shared or network drives within the CM network. Records or documents that are not required to be maintained pursuant to Schedule A, should be retained for only so long as they serve a business purpose. CM does not have access to and, therefore, cannot be responsible for, the management of computer files not on CM's network. Employees must manage files maintained on their computers, devices and any disks, drives, or other recordable media and are required to apply all the document management practices identified in the Policy to the information stored on their computers, devices, disks, drives, and/or other recordable media. When an employee leaves CM, information on the hard drive of the CM computer he/she used will be transferred or deleted as appropriate and the CPU will be reformatted so that it may be used by another employee.

Subpoenas, Litigation, and Other Disputes

CM, like all companies, may, from time to time, receive subpoenas, document requests, and other types of official or legal inquiries for specified records. It is CM's policy to comply fully with all such lawful requests.

CM's Senior Management after consultation with legal counsel as determined necessary by senior management, will determine whether a particular request is proper and oversee compliance with appropriate requests. Any employee who receives any such request for documents or records, or any other legal pleading or filing, should immediately forward it to the Director. These types of requests have firm deadlines that require a prompt response. Missing these deadlines could potentially result in legal exposure, fines, penalties, and other costs being assessed against CM. Each employee's prompt transmission of these requests to the Director is, therefore, critically important as is their assistance in locating any responsive material.

Once legal counsel has determined which records, if any, CM is required to locate and produce in response to a legal request, they will, to the extent necessary, coordinate with employees to provide direction regarding responding to the request. Compliance with this Document Management Policy should enable CM employees to more quickly and efficiently locate any responsive documents by reducing the clutter of non-responsive and outdated material. Additionally, the Director will notify affected personnel if procedures under this Policy that might otherwise apply to requested documents (such as scheduled destruction) should be suspended or altered.

Changes to Policy; Compliance

As we grow, our Document Management Policy will need to grow with us. Doubtless, there will be categories of records that are created in the future that are not covered by this Policy as initially written. As future categories of documents arise, employees should work with the Director to determine the applicability of the Policy to such documents.

Compliance with this Policy is of the highest importance to CM. Non-compliance will result in disciplinary action and can have adverse legal, regulatory, and cost-control consequences. We thank you in advance for your efforts to comply with this Policy.