



Ricoh India

Preservation of Documents Policy

Date: 01/12/2015



Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) mandates all the Listed Companies to formulate and put in place a policy for preservation of Documents.

The Board of Directors of Ricoh India Limited (the “Company”) is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company effective 1 December, 2015.

Definitions

1. “Board”

Board means “Securities and Exchange Board of India.”

2. “Company”

Company means “**Ricoh India Limited**”

3. “Documents”

Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

4. “Listing Regulations”

Listing Regulations means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

Objective of the Policy

This Policy provides a comprehensive framework for preservation of documents for a specified period of time with a view to accomplish the following objectives:-

- (a) Better Corporate Governance
- (b) Effective Risk Management
- (c) Effective Information Management to support the work of the administration and provision of continued access



- (d) Effective and Systematic disposal/destruction of Company's non current records that have outlived their utility
- (e) Documents whose preservation shall be permanent in nature
- (f) Documents with preservation period of not less than eight (08) years after completion of the relevant transaction(s).

Provided further that the Company may keep the documents as specified above in electronic mode.

Principle of Responsibility of Employees for Preservation of Documents Record

All the Employees of the Company are responsible for taking into account the potential impact/effect on preservation of the documents in their designated work area and their decision to retain/preserve or destroy the documents pertaining to their domain/field as the case may be.

Periodical Review of the Policy by Top Management

The Policy should be flexible and easy to understand and complied by all the levels of the Employees. The policy will be reviewed periodically by the Management and amendment(s), if any to the same will be done subject to the approval of the Board of Directors. The Top management may also review the policy on document retention from time to time so as to see that the same remains compliant with the Local, State or Central Legislation(s) that may be promulgated from time to time

Record Appraisal

The Company shall at regular intervals carry out the appraisal of the records. The purpose of the appraisal process shall be to ensure that the records are examined at the appropriate time to determine (i) whether they need to be retained for a longer period as they are still in use; or (ii) whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the concerned Department Head of the Company to whom the concerned Records belongs.

Provision with regard to Preservation of Documents under various Law



Several categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

- a) **Tax Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues.

Tax records may be retained for at least Eight years from the date of filing the applicable return.

- b) **Employment Records/Personnel Record:** The Company will keep personnel/Employees related files or any other documents as the case may be.

Employment and personnel records will be retained for Eight years or till the cessation of the employee.

- c) **Board and Board Committee Materials:** Meeting minutes should be retained in perpetuity in the Company's minute book.

- d) **Legal Files:** Company's Advocates will be consulted to determine the retention period of particular documents/legal files and records. However, legal documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later

- e) **Marketing and Sales Documents:** The Company will keep final texts of marketing and sales documents for a period of Eight years at least.

- f) **Intellectual Property and Trade Secrets:** The Intellectual Property Right related documents like Copyright, Patent and Trade Mark, if any are intangible assets of the Company and are of immense value to the Company and hence needs to be protected as Trade Secret by the Company.

However, the Company will keep all documents/assets so coming under the purview of Intellectual Property Rights and Trade Secrets for life long.



- g) **Contracts:** Final executed copies of all Contracts entered into by the Company be retained. These final Contracts be maintained as per the applicable Laws governing these Contracts.

Further, the documents or records not covered vide this Policy shall be maintained by the Company for the time period specified for their preservation under the applicable and relevant Statute or Regulation as the case may be.

General

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

Amendment and Review of the Policy

The Board of Directors of the Company reserves the right to review, amend or modify this Policy in whole or in part as may be required at any point of time.
