### Global Records Retention Policy & Schedule

**Administrative**

<table>
<thead>
<tr>
<th>Global Policy Ref.</th>
<th>Record Category</th>
<th>Description</th>
<th>Examples</th>
<th>Retention Period as per Proposed India SOP</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRS001</td>
<td>Administrative Records</td>
<td>Documentation relating to routine administrative activities performed by most departments, regardless of function, such as correspondence, agendas, diaries, etc.</td>
<td>Activity Reports / Agendas / Minutes / Semi-annual Reports / Administrative Records / Calendar / Dinner / Catering Requests / Chronological / Running Free / Conference Room Requests / Correspondence / Departmental Files / Meeting Files / Minutes / Reports / Service Requests / Telephone Messages / Logbooks / Travel / Trip Reports / Vacation Schedules</td>
<td>No longer than 1 year</td>
</tr>
<tr>
<td>GRS002</td>
<td>Equipment Records</td>
<td>Documentation accumulated as a result of the purchase and use of non-regulated equipment.</td>
<td>Calibration Records / Designs &amp; Specifications / Maintenance Records / Operator Instructions / User Manuals / Warranty / No longer than 1 year after life of equipment</td>
<td></td>
</tr>
<tr>
<td>GRS003, GRS004</td>
<td>Financial Planning and Reporting Records</td>
<td>Documentation that examines the Company's internal operations to determine financial decisions and direction.</td>
<td>(A) Budget Files / Capital Expenditure Decision Making Records / Cost Centre Reports / Economic Analysis Records / Financial Analysis Files / Financial Summaries / Forecast Files / Gross Profit Records / Journal Entries / Profit &amp; Loss Statements / Sales Schedules / Strategic Authority Forms / Capital Expenditure Approval / Capital Expenditure Requests / Income Statements / Cheque Requests / Cost Justification Files / Expense Reports / Travel Awards / Sponsorship / Forecasts / Invitations / Mileage Reimbursement Records / Purchased Order / Reimbursement Requests / Receipts</td>
<td>For not less than 5 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS005</td>
<td>Inventory Records</td>
<td>A detailed list of all goods and materials in stock.</td>
<td>(A) Discrepancy Reports / Inventory Lists</td>
<td>No longer than 8 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS006</td>
<td>Personnel / Supervisory Records</td>
<td>Documentation maintained by line managers to facilitate the day-to-day management of their employees. (Company official employee records are covered elsewhere on the Schedule.)</td>
<td>Professional Development Records / Update Meeting Notes</td>
<td>For not less than 5 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS007</td>
<td>Planning Records</td>
<td>Documentation relating to the formulation and implementation of strategic programme planning, including documentation on objectives, strategies, and tactics, etc. for a specified period of time.</td>
<td>Annual / Semi-annual Planning Records / Strategic Planning Records</td>
<td>No longer than 3 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS008, GRS009</td>
<td>Policy / Procedure (Non-regulated) - Company level and departmental</td>
<td>Policies and procedures governing significant company, business unit, region, area or function and departmental operations that are not regulated.</td>
<td>Corporate Policies / Corporate Standards / Standard Operating Procedure (SOP) / Guidelines / Standard Operating Procedure (SOP) - Guidelines / Standard Operating Procedure (SOP) - Schedule of Regular Activities</td>
<td>(A) - Company level - 7 Years after Superseded by New Version (B) - Departmental level - No longer than 3 Years after Superseded by New Version</td>
</tr>
<tr>
<td>GRS010</td>
<td>Programme / Operational Records (Non-regulated) - Departmental</td>
<td>Records of ongoing departmental programmes where these programmes can be non-regulated.</td>
<td>Programme Correlation Records / Programme Minutes / Programme Notes / Programme Publicity</td>
<td>No longer than 3 years immediately preceding current year</td>
</tr>
</tbody>
</table>
### Discover, Research and Develop Drugs/Products

<table>
<thead>
<tr>
<th>Record</th>
<th>Description</th>
<th>Retention Period as per Proposed Rule (Yr)</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>90516</td>
<td>Support Event Records</td>
<td>Authorization repeating previous records to the company's management and controlled product.</td>
<td>1 Year after end of Product Life</td>
</tr>
<tr>
<td>90515</td>
<td>Audio- &amp; Video- Recording</td>
<td>Records generated in the course of plain and non-regulated experiments.</td>
<td>10 Years after end of Audiovisual Agreement</td>
</tr>
<tr>
<td>90514</td>
<td>Audit &amp; Inspection Records</td>
<td>Documents that may be recorded in the course of preclinical or clinical studies.</td>
<td>7 Years after Audit is Closed</td>
</tr>
<tr>
<td>90513</td>
<td>Clinical Compliance with Quality Assurance (QA)</td>
<td>Documents that may be recorded in the course of preclinical or clinical studies.</td>
<td>30 Years</td>
</tr>
<tr>
<td>90512</td>
<td>Computer System Documentation, Research &amp; Development Applications</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>30 Years</td>
</tr>
<tr>
<td>90511</td>
<td>Drug / Product / Portfolio Records</td>
<td>Documents generated in the course of drug development.</td>
<td>30 Years after Export Issued</td>
</tr>
<tr>
<td>90510</td>
<td>Human Biological Sample Records</td>
<td>Records that may be recorded in the course of human biological samples obtained by the company.</td>
<td>30 Years after Sample Exhausted or Disposed of</td>
</tr>
<tr>
<td>90509</td>
<td>Laboratory Records</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>30 Years after Use of Systems</td>
</tr>
<tr>
<td>90508</td>
<td>Electricity Records</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>30 Years</td>
</tr>
<tr>
<td>90507</td>
<td>Laboratory Animal Management Records</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>6 Years</td>
</tr>
<tr>
<td>90506</td>
<td>Laboratory Animal Records</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>6 Years</td>
</tr>
<tr>
<td>90505</td>
<td>Laboratory Animal Supplementary Data</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>6 Years</td>
</tr>
<tr>
<td>90504</td>
<td>Manufacturing Records - Preclinical and Clinical Development</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>6 Years</td>
</tr>
<tr>
<td>90503</td>
<td>Organization Charts and Lab Descriptions (Regulated)</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>30 Years after Superseded by New version</td>
</tr>
<tr>
<td>90502</td>
<td>Procedures / Protocols</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>10 Years after Superseded by New version</td>
</tr>
<tr>
<td>90501</td>
<td>Project Records - Non-regulated</td>
<td>Records generated in the course of research and development of new compounds except for laboratory computer systems.</td>
<td>10 Years after Superseded by New version</td>
</tr>
</tbody>
</table>

### General Records - Non-regulated

- Reference Material
- Training / Education
- Drug / Product / Human Biological
- Disaster Recovery
- Transitory voice communication sent and received by telephony
- Audit / Inspection
- Laboratory Animal
- Preclinical Study
- Policies / Manufacturing

### Examples

- Email –
- Structured information from different originating systems
- Laboratory
- Description
- R&D Facility
- Discover, Research and Develop Drugs/Products
- Records
- Equipment, Utilities
- Records
- Study
- Procedures (Regulated)
- and Clinical Records - Preclinical and / or Regulatory Records
- Management (Regulated)
- Records
- Sample
- Records
- Portfolio
- Systems
- Research & Documentation - Records
- Records - Terminated
- Records
- Research & Records
- Records
- Back-ups
- Reference Material
- Vital Record / Security Back-ups
- Outdated Material
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<table>
<thead>
<tr>
<th>GRS034</th>
<th>Accession Reports - Technical Documents</th>
<th>Supporting information for accession numbers, research, development and medical activities.</th>
<th>5 Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRS035</td>
<td>Accession Reports - PRECLAB - Laboratory Animal Sciences - NMRI</td>
<td>New specimens collected during preclinical or health screening purposes.</td>
<td>30 Years after Processing Completed</td>
</tr>
<tr>
<td>GRS036</td>
<td>Accession Reports - PRECLAB - Laboratory Animal Sciences - Wet</td>
<td>New specimens collected during preclinical or health screening purposes.</td>
<td>5 Years</td>
</tr>
<tr>
<td>GRS037</td>
<td>Accession Reports - PRECLAB - Human</td>
<td>New specimens collected during preclinical studies.</td>
<td>10 Years after Report Issued or Communication</td>
</tr>
<tr>
<td>GRS038</td>
<td>Accession Reports - PRECLAB - DNA Bank</td>
<td>New specimens collected during preclinical studies.</td>
<td>10 Years after Report Issued or Communication</td>
</tr>
<tr>
<td>GRS039</td>
<td>Accession Reports - PRECLAB - DNA Specimens</td>
<td>New specimens collected during preclinical studies.</td>
<td>10 Years after Report Issued or Communication</td>
</tr>
</tbody>
</table>

### Manage the Organization

<table>
<thead>
<tr>
<th>Document Category</th>
<th>Description</th>
<th>Expiration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Training / Education Resources</td>
<td>New Employee Induction Programme</td>
<td>3 Years</td>
</tr>
<tr>
<td>Training / Education Resources</td>
<td>Records of internal and external training events</td>
<td>15 Years after Superseded</td>
</tr>
<tr>
<td>Training / Education Resources</td>
<td>Records of internal and external training events</td>
<td>15 Years after Superseded</td>
</tr>
<tr>
<td>Training / Education Resources</td>
<td>Records of internal and external training events</td>
<td>15 Years after Superseded</td>
</tr>
</tbody>
</table>

### Specimens

- GRS040: Raw specimens collected during preclinical or health screening purposes.
- GRS041: Raw specimens collected during preclinical or health screening purposes.
- GRS042: Raw specimens collected during preclinical or health screening purposes.
- GRS043: Raw specimens collected during preclinical or health screening purposes.
- GRS046: Raw specimens collected during preclinical or health screening purposes.
- GRS047: Raw specimens collected during preclinical or health screening purposes.
- GRS048: Raw specimens collected during preclinical or health screening purposes.
- GRS049: Raw specimens collected during preclinical or health screening purposes.

### Auditing

- GRS050: Audit, Records, Audit Schedules: Completed findings reports to internal or external auditors. | 12 Years after Life of Programme |

### Records

- GRS051: Records - Business Continuity Planning Records: Supportive examples of business continuity planning records. | 3 Years |

### Accounting Records

- GRS052: Accounting Records: Documentation detailing planned / actual transactions within the Company or between the Company and others. | 3 Years |

### Corporate Communications

- GRS053: Corporate Communications Records: Corporate communications materials prepared or used for the business for external use with investors, stock analysts, corporate regulatory and the general public. | 3 Years |

### Corporate Records

- GRS054: Corporate Records - Internal: Internal Company communications materials that are widely distributed throughout the organization or within large business units. | 3 Years |

### Compensation / Programme Records

- GRS055: Compensation / Programme Records: Documentation detailing planned and actual salaries at the Company's various compensation programmes. | 30 Years after Employment Ends |

### Computer System Documentation

- GRS056: Computer System Documentation - Software Applications / Systems: Documentation relating to the design, development or selection, implementation, use, and removal of computer applications / systems. Computer systems used for GxP regulated processes are covered in other sections of the Schedule. | 7 Years after Closure of Programme |

### Documentation

- GRS057: Documents, Descriptions and Records: Documents, Descriptions and Records relating to the design, development or selection, implementation, use, and removal of computer applications / systems. Computer systems used for GxP regulated processes are covered in other sections of the Schedule. | 7 Years after Closure of Programme |

### GxP Compliance

- GRS058: GxP Compliance: Documentation detailing planned / actual transactions within the Company or between the Company and others. | 3 Years |

### Warranty Records

- GRS059: Warranty Records: Documentation detailing planned / actual transactions within the Company or between the Company and others. | 3 Years |

### Regulatory Records

- GRS060: Regulatory Records: Documentation detailing planned / actual transactions within the Company or between the Company and others. | 3 Years |

### Supportive Examples

- GRS061: Supportive Examples: Supportive examples of business continuity planning records. | 3 Years |

### Validation

- GRS062: Validation: Validation Plans & Specifications: Validation Plans & Specifications. | 3 Years |

### Web Presence

- GRS063: Web Presence: Documentation detailing planned / actual transactions within the Company or between the Company and others. | 3 Years |
<table>
<thead>
<tr>
<th>Document Type</th>
<th>Description</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contracts / Agreements</td>
<td>Documentation relating to legal, binding terms and conditions of agreements between the Company and other people / organizations.</td>
<td></td>
</tr>
</tbody>
</table>
Insurance Records

- Claim Records
- Programme Records

Insurance Records - Liability

- Liability Insurance
- Liability for Professional and Product Liability
- Professional Liability
- Product Liability

Insurance Records - Life

- Life Insurance
- Group Health Insurance

Insurance Records - Executive

- Executive Insurance
- Executive Liability

Retention Period as per the contract:
- Life & Health
- Group Health
- Business
- Executive/Professional

In the event of a legal dispute or other jurisdictional requirements:
- Life
- Health
- Group Health
- Business
- Executive/Professional

Intellectual Property

- Intellectual Property Rights
- Patent Application
- Trademark Application
- Copyright Application

Retention Period as per the Life of Business

Legal Project

- Legal Project Records
- Contract
- Construction
- Litigation

Retention Period:
- Life of Business

Recruitment

- Recruitment Records
- Application
- Screening
- Interview
- Appointment

Retention Period:
- On the file until completed or cancelled

Payroll

- Payroll Records
- Compensation
- Benefits

Retention Period:
- 10 Years

Property

- Property Records
- Lease
- Finances
- Insurance

Retention Period:
- Life of the property

Manufacture Products

- Manufacturing
- Production
- Quality Assurance

Retention Period:
- 10 Years

Mergers, Acquisitions & Divestiture

- Mergers, Acquisitions & Divestiture Records

Retention Period:
- Life of the Business

Due Diligence

- Due Diligence
- Financial
- Legal

Retention Period:
- 10 Years

Industry

- Industry Records
- Environmental
- Safety

Retention Period:
- 10 Years

Employee

- Employee Records
- Performance
- Compensation

Retention Period:
- Life of the employee

Asset

- Asset Records
- Property
- Equipment

Retention Period:
- Permanent

Records Details

- Records and their retention periods
- Insurance
- Legal
- Recruitment
- Payroll
- Property
- Manufacturing
- Mergers
- Divestitures
- Due Diligence
- Industry
- Employee

Documentation

- Documentation regarding regulatory, legal, and compliance aspects
- Records of contracts, agreements, and correspondence

Retention Period:
- Life of the contract
- Legal
- Recruitment
- Payroll
- Property
- Manufacturing
- Mergers
- Divestitures
- Due Diligence
- Industry
- Employee

Analysis

- Analysis and records regarding regulatory, legal, and compliance aspects
- Records of contracts, agreements, and correspondence

Retention Period:
- Life of the contract
- Legal
- Recruitment
- Payroll
- Property
- Manufacturing
- Mergers
- Divestitures
- Due Diligence
- Industry
- Employee

Cells and Bank Records

- Cells and Bank Records
- Production
- Quality Assurance

Retention Period:
- Life of the product
- Legal
- Recruitment
- Payroll
- Property
- Manufacturing
- Mergers
- Divestitures
- Due Diligence
- Industry
- Employee

Mergers, Acquisitions & Divestiture

- Mergers, Acquisitions & Divestiture Records

Retention Period:
- Life of the business
Batch Related
Batch Related
Batch Related
Description
Training / Education
Retention Period as per
Advertising and
Computer System
Master
Controlled Drugs
20 Years after Initial Approval or
10 Years after Batch is Released
GRS097
Global policy
GRS113
GRS096
GRS094, GRS093
GRS127
GRS087
GRS086
GRS085
GRS120
GRS082, GRS126
GRS124
Market & Sell Products
Records Category (Regulated)
Material Records –
Employee Records -
Product and 
Records –
Product Incident Ingredients (API)
Pharmaceutical 
Management 
Product Incident
to (Regulated)
Biological Products & Technical 
Procedure Records
Specification & 
Specifications &
Process Validation
Expiration Dates
Product, Filled
Product, Bulk
Product
Records –
Biologicals Bulk,
Records–
Filling Records
Biologicals
Environment, Health & Safety Training
Completion Records
Enrolment Records
Training Materials
Master Registration /
Handbooks
Master Presentation
Evaluation Summaries:
Non-technical Training for Role.)
Records
Lists of Training
Incident Management Reports
Evaluation & Decision 
Procedure Appendices
Biologicals
Local Standard Operating 
Records
Technical Terms of Supply
Product Packaging Specification 
Master Formula Records
SOPs) 
Master Batch Records &
Validation Reports & Batch Records
Indexes of Master Specifications &
Validation Protocols
Master Change Control Records – Non-
Disposals
Supply Registers
Records
Production Control 
Supply Records
Process Control
Laboratory Test 
Investigations
Environmental Monitoring Records
Calibration Equipment Maintenance
Records
Clinical Lots Batch 
Records: Certificate of

3 Years after Receipt of Complaint (whichever is longer)
3 Years after Life of System
7 Years after Life of Facility, Premises, Equipment, etc.
7 Years after Use of the Last Quantity of Product
6 Years after Supervised by New Personnel
20 Years after Superseded by New Personnel
7 Years after Supervised by New Personnel
7 Years after Supervised by New Personnel
7 Years after Batch Expires or 1 Year after Last Manufactured
20 Years after Batch is Released
7 Years after Employment Ends
<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRS100</td>
<td>Business Development Records</td>
<td>2 Years after Reference Completed</td>
</tr>
<tr>
<td>GRS101</td>
<td>Competition Information</td>
<td>1 Year after Reference Completed</td>
</tr>
<tr>
<td>GRS102</td>
<td>Customer Interface Records</td>
<td>For not less than 8 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS103</td>
<td>Customer Interface Records</td>
<td>For not less than 8 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS104</td>
<td>Healthcare Education Records</td>
<td>5 Years after Reference Completed</td>
</tr>
<tr>
<td>GRS105</td>
<td>Market Research Studies – Consumer Healthcare Products</td>
<td>5 Years after Reference Completed</td>
</tr>
<tr>
<td>GRS106</td>
<td>Pricing Information Records</td>
<td>5 Years after Product Launch</td>
</tr>
<tr>
<td>GRS107</td>
<td>Pricing History Records</td>
<td>5 Years after Product Launch</td>
</tr>
<tr>
<td>GRS108</td>
<td>Product Life / Contract Records</td>
<td>For not less than 6 years immediately preceding current year</td>
</tr>
<tr>
<td>GRS109</td>
<td>Sales Reporting and Analysis Records</td>
<td>3 Years</td>
</tr>
<tr>
<td>GRS110</td>
<td>Sample Accountability Records</td>
<td>3 Years (maximum) under litigation hold</td>
</tr>
</tbody>
</table>