



1 INTRODUCTION

1.1 This document retention and destruction policy (the “Policy”) explains how The One-Shot Corporation, and its affiliates (together “**One-Shot**”) retain Records necessary for ongoing business operations, legal, audit and regulatory compliance, and destroys such records, whilst promoting orderly and efficient records management.

1.2 The law requires One-Shot to maintain certain records for certain periods of time. Failure to retain those records for those periods could subject One-Shot to adverse consequences.

1.3 This Policy:

(a) forms part of One-Shot’s [Data Protection Policy](#):

HYPERLINK TO DATA PROTECTION POLICY);

(b) may be amended by One-Shot at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated in the version number set out herein; and

(c) must be complied with unless you have reason to believe that:

(i) a Proceeding is pending or reasonably anticipated, in which case you must immediately contact One Shot for further guidance before destroying, altering, moving or rearranging any Records; or

(ii) One-Shot has ordered a Hold Instruction in which case Records should be maintained for review by One-Shot’s Legal representation.

2 DEFINITIONS

2.1 “Data Protection Laws” is as defined in the [Data Protection Policy](#);

“Hold Instruction” means an instruction from One-Shot’s Legal representation to preserve documents in relation to a Proceeding;

“Personal Data” is as defined in the [Data Protection Policy](#);

“Proceeding” means any legal, official, governmental or other proceeding or

investigation; and

“Records” means all documents and other data (including Personal Data) that are created, received, used or distributed by One-Shot in the course of its business, regardless of medium and includes without limitation hard copy, soft copy, Excel or PowerPoint files, emails (inbox, outbox, drafts, folders and trash files), cloud storage, instant messages, intranet and other media.

2.2 Words denoting the singular shall include the plural and vice versa.

2.3 Unless otherwise stated, all defined terms have the same meaning as defined in the Data Protection Policy.

3 GENERAL PRINCIPLES

3.1 You must consistently follow this Policy to ensure One-Shot's compliance with all applicable record keeping requirements in the relevant territory. One-Shot are required to ensure that complete and accurate records are identified, retained, stored, protected and subsequently destroyed or archived within their area of assigned responsibility and in accordance with this Policy. All levels of management are responsible for ensuring that all staff under their supervision comply with this Policy.

3.2 The principal objectives of this Policy are:

(a) to ensure that Records:

(i) are retained appropriately including for the appropriate period;

(ii) which may need to be tendered as evidence in Proceedings are kept in a manner that ensures they will be admissible in those Proceedings;

(iii) are retained only as long as those Records serve the immediate purposes for which they were created; and

(iv) are permanently archived in accordance with law after their retention period has lapsed and they are no longer needed;

(b) to ensure that One-Shot's information needs are met;

(c) to minimise the retention of Records after carefully assessing risks;

(d) to ensure that all disposal of Records is:

(i) efficient, orderly and appropriate; and

(ii) properly recorded.

3.3 This Policy applies to Records located anywhere including without limitation in One Shot's premises, personal homes of employees and contractors, and storage facilities.

4 RETENTION PROCEDURES

4.1 Records must be categorised by purpose and retained for specific periods in accordance with Schedule 1.

4.2 One-Shot must comply with Data Protection Laws which require that Personal Data must not be kept longer than is necessary for the purpose for which it was collected.



This requires that Personal Data must be physically destroyed and/or erased and purged from One Shot's systems when it is no longer required, unless a minimum retention period is specified or a Hold Instruction has been issued in relation to the relevant Record.

4.3 Personal Data must be accurate and kept up to date. Inaccurate or out of date Personal Data must be rectified or destroyed/erased.

4.4 Retention periods vary depending on the country in which the Records are kept. For further information about the retention period for each category of Record, refer to Schedule 1.

5 HOLD INSTRUCTION

5.1 In the case of an actual, pending or reasonably anticipated Proceeding, One-Shot's Legal Representation (Legal) may issue a Hold Instruction.

5.2 If a Hold Instruction is ordered or you otherwise believe a Proceeding is pending or reasonably anticipated, Records must be maintained for review by One-Shot's Legal Representation. If you believe you may have material related to a Proceeding but require assistance, promptly contact Legal. You must not delete, discard or destroy any Records you may have that may be subject to a Hold Instruction. If you have any doubt whether a Record is relevant to a Hold Instruction, save it and provide it to Legal.

5.3 If a Record is subject to a Hold Instruction, that Record must be retained until the Hold Instruction is removed by Legal.

5.4 Failure to comply with this Section, to seek guidance and preserve Records can result in serious adverse consequences to One-Shot and any person involved.

6 DESTRUCTION OF DOCUMENTS

6.1 It is unlawful to destroy, conceal or falsify any Record for the purpose of obstructing or influencing any Proceeding. Doing so may subject One-Shot and any offending individuals to civil and criminal penalties including fines and imprisonment.

6.2 You are only permitted to destroy Records when all the following conditions are met:

- (a) no improper motive for the destruction of the Records;
- (b) no legal or regulatory reason to maintain the Records;
- (c) the destruction is in accordance with mandated retention periods as set below:
 - (i) employment records – 4 years; and
 - (ii) contracts – 10 years.



(iii) leads – 3 years.

(d) no Hold Instruction is in place.

7 END OF SERVICE

Each employee (including full and part-time, and temporary employees) and contractor must return to One-Shot or destroy, at One-Shot's option, all Records in their possession upon the end of their service with One-Shot. This includes, without limitation, Records located anywhere including without limitation in One-Shot's premises, personal homes of employees and storage facilities.

8 DOCUMENT CONTROL

8.1 Gary McGill is the owner of this Policy and is responsible for ensuring that this procedure is reviewed in line with the relevant review requirements.

8.3 This Policy was approved by the Directors of One-Shot in September 2018 and is issued on a version-controlled basis.