

SENIOR TRUST MANAGEMENT LIMITED

DOCUMENT DISPOSAL AND RETENTION POLICY

The purpose of this policy is to provide a framework and to assign responsibilities for ensuring that full and accurate records of the business activities of Senior Trust Management Ltd (**Senior Trust**) are created, maintained and disposed of in accordance with best practice. Senior Trust is committed to establishing and maintaining recordkeeping practices that meet its business needs, statutory requirements and investor expectations using the following principles:

It is the responsibility of the Senior Trust Executive Director and all employees to ensure that this policy adhered to.

Senior Trust will ensure that meets its legislative obligations under the various NZ laws that impact document retention and disposal such as:

Electronic Transactions Act 2002

Official Information Act 1982

Privacy Act 1993 (New Zealand)

Relevant financial legislation also imposes recordkeeping requirements, in particular:

Goods and Services Tax Act 1985

Tax Administration Act 1994

Companies act 1993

AML/CFT Act 2009

FMA & FMCA Acts

Additionally, Senior Trust will comply with any requirements imposed by its MIS licence and NZX listing in as much as they would impact document retention and disposal.

STML's files including investor files are held off site for a period of 8 years which is longer than the required 7-year period. These files are easily retrieved by signing in to Recall's website www.recall.com. The files are retrieved after login by typing in the bar code. Files can be delivered within a matter of hours if necessary for inspection by FMA.

For borrower files, all security documentation, financial accounts, valuations etc either saved directly or scanned into our Remote Desktop Service provided by Outsource IT files which are stored in the cloud. Files can therefore be retrieved rapidly if required for inspection by FMA.

All data is cloud stored, however as additional security full backups are performed on a regular basis to hard disk which are stored off site.

Storage of Records

All hard and soft copy records will be stored in compliance with the above retention periods regardless of storage medium.

All hard copy records will be stored using the facilities of company **Recall/ Iron Mountain** per the service level agreement. Once a year a review of all stored records will be undertaken to establish what items can be disposed of and a review of papers records stored in the office at 44 Constellation Drive will be reviewed to determine what can be moved offsite to **Recall/ Iron Mountain**.

Soft copy documents will be stored on the on-line server and in accordance with the agreement with Outsource IT. A weekly back up of all information held on the server will be made to a portable drive that will stored offsite

Board Approval of Policy

Version 1 Approved 06/12/2016

Version 2 Approved 26/1/2018