



VLCC HEALTH CARE LIMITED

CIN: U74899DL1996PLC082842

**POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL
OF DOCUMENTS (THE "POLICY")**

Type: Policy	Owner: Board of Directors	Custodian: Company Secretary
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1. INTRODUCTION

VLCC Health Care Limited (“**Company**”) has framed this Policy, which is primarily framed based on the applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as defined below) and Companies Act, 2013, each as amended.

Archival policy as referred to in the Listing Regulations forms part of this Policy.

This Policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of the Companies Act, 2013.

2. DEFINITIONS

- (a) “**Act**” means the Companies Act, 2013 along with rules, notifications and circulars made / issued thereunder, as amended from time to time.
- (b) “**Applicable Law(s)**” include any statute, law, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, notification and clarification issued by any governmental, regulatory or statutory authority or other governmental instruction and/or mandatory standards, as may be applicable to the Company, and as amended from time to time.
- (c) “**Board of Directors**” or “**Board**” means the board of directors of the Company, or a duly constituted committee thereof.
- (d) “**Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

Any other terms used in this Policy, and not defined herein, shall have the same meaning as assigned to such terms under the Act, the Listing Regulations or any other Applicable Law.

3. PURPOSE OF THE POLICY

The Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows:

- (a) Documents whose preservation shall be permanent in nature;
- (b) Documents with a preservation period of not less than 8 (eight) years after completion of the relevant transactions.

Provided that the Company may keep the documents specified in clauses (a) and (b) in electronic mode.

Further, according to the Listing Regulations, all events or information which has been disclosed to stock exchange(s), shall be hosted on the website of the Company for a minimum period of 5 (five) years and thereafter as per the archival policy of the Company, as disclosed on its website. Besides the above, as per applicable provisions of the

Act, certain statutory documents must be maintained. Accordingly, this Policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of the Act.

The application of this Policy shall be in addition to, and not in derogation of, the rules prescribed under Applicable Laws, to the extent that they apply to the Company, for the preservation and/ or destruction of records. Wherever the period of preservation recommended under this Policy, and the period of preservation prescribed under the other Applicable Laws, including the Listing Regulations and/ or the Act is conflicting, the higher period shall be considered for preservation.

This Policy aims at providing the guidelines on preservation of documents of all functional departments of the Company. It applies to all official documents (physical/electronic/on the website(s)) generated in the course of the Company's operations.

4. APPLICABILITY

This Policy is applicable to VLCC Health Care Limited.

5. PRESERVATION OF DOCUMENTS

(a) Preservation of Documents with specific reference to the Act and Listing Regulations

(i) Documents whose preservation shall be permanent in nature:

All those documents which are required to be preserved permanently in accordance with the provisions of the Act and other Applicable Laws shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in **Annexure - A**.

(ii) Documents with preservation period of not less than eight years after completion of the relevant transactions:

All those documents which are required to be preserved in accordance with the provisions of the Act and other Applicable Laws or if any documents are required to be preserved as per the decision of the functional heads of the Company, for a period of not less than 8 (eight) years after completion of the relevant transactions, shall be preserved accordingly. Details of documents with preservation period of not less than 8 (eight) years after completion of the relevant transactions is listed in **Annexure - B**.

(iii) Documents with preservation period other than those mentioned in (a) or (b) above:

All those documents which are required to be preserved in accordance with the provisions of the Act and other Applicable Laws, as may be applicable to the Company from time to time, for a period other than as mentioned in (a) and (b) above shall be preserved accordingly.

(b) Documents to be made available on the website of the Company as required by the Act and the Listing Regulations

- (i) The Company is required to maintain a functional website containing:
 - the basic information about the Company,
 - all information and/or documents as specified in the applicable provisions of Act and Listing Regulations,
- (ii) The Company shall ensure that contents of the website are correct.
- (iii) The Company shall update any change in the content of its website within 2 (two) working days from the date of such change in content.
- (iv) Information and/ or documents that need to be made available the Listing Regulations shall be made available on the website simultaneously with disclosure of such documents to the relevant stock exchanges.
- (v) The information and/or documents uploaded on the website shall be available for the current financial year and for the five financial years preceding the current financial year.
- (vi) After the expiry of time mentioned in Clause 5(b)(v) of this Policy (i.e. 5 (five) financial years preceding the current financial year), the information and/or document shall be removed from the Company's website. The backup of said information and/or document, which has been removed from the Company's website, shall be maintained/ preserved in the server for a minimum period of 3 (three) years, and after expiry of this period of 3 (three) years, the backup may be permanently removed from the server.
- (vii) Information and/ or documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/searched by the viewers, viz.
 - The information and/or documents may be arranged financial year wise with further segregation into four quarters of the financial year.
 - All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

6. ARCHIVAL OF DOCUMENTS MENTIONED IN CLAUSE 5

Documents mentioned in Clause 5 above shall be maintained/ preserved in the following manner:

(a) Documents maintained in physical form:

- (i) All information and/or documents pertaining to the current financial year and for one financial year preceding the current financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.

- (ii) All documents pertaining to the period prior to one financial year preceding the current financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance/ preservation in accordance with **Annexure – A** and **Annexure – B** of this Policy. The said records be also maintained in such a manner that their retrieval is easy and quick.

(b) Documents maintained in electronic form:

- (i) All documents pertaining to the current financial year and for one financial year preceding the current financial year shall be maintained on a server and a backup of the same shall be maintained, and updated, on a scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
- (ii) Back up of all documents pertaining to the period prior to one financial year preceding the current financial year, shall also be maintained on such server, in good condition at least up to the minimum period specified for their maintenance/preservation in accordance with **Annexure–A** and **Annexure–B** of this Policy. The said records be also maintained in such a manner that their retrieval is easy and quick.

7. DESTRUCTION OF DOCUMENTS MENTIONED IN CLAUSE 5

If, upon review by the Company, any of the documents mentioned in Clause 5 of this Policy are not required to be maintained and preserved permanently or for the specified period, as the case may be, they shall be destroyed after joint approval of any two of Legal Head, Managing Director , Chief Financial Officer and Company Secretary of the Company.

The Company shall maintain a register of disposal of records in the custody of the Compliance Officer of the Company, wherein the brief particulars of the records disposed of shall be entered.

The register of disposal of records shall contain particulars of records disposed and shall be maintained permanently with the assistance of the Compliance Officer, either in physical or electronic form.

8. AMENDMENTS AND CONFLICT

Any subsequent amendment/modification in the Applicable Laws shall automatically apply to this Policy. The Board has the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever. In the event of conflict between this Policy and any Applicable Laws, Applicable Laws shall prevail.

Annexure – A

Documents / record whose preservation shall be permanent in nature

Sl. No.	Documents / Records
1.	Certificate of incorporation
2.	Memorandum and Articles of Association
3.	Agreements made by the Company with stock exchanges, depositories, etc.
4.	Minute books of general meetings, Board and committee meetings as per the Act
5.	Register and index of members, debenture-holders, if any or other security holders, if any
6.	Register of Contracts as per the Act
7.	Register of Charges as per the Act
8.	Register of Investments as per the Act
9.	Register of loan, guarantee, security or acquisition as per the Act
10.	Files relating to premises viz. title deeds/ lease deeds of owned premises/land and building, etc. and related ledger / register
11.	Document is of significant importance in case of a dispute with third parties involving material amounts.
12.	Document representing a title to an intellectual property
13.	Authorization / licenses / approval / sanction / permission obtained from any statutory authority
14.	Policies of the Company framed under Applicable Laws
15.	Register of disposal of records
16.	Such other records as may be required under Applicable Laws

Annexure – B

Documents / annual record to be preserved for a minimum period of eight years

Sl. No.	Documents / Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per the Act
2.	Annual Returns as per the Act
3.	Register of Deposits as per the Act
4.	Register of Allotment (from the date of each allotment) as per the Act
5.	Annual financial statements including: <ul style="list-style-type: none">- Annual accounts- Directors report- Auditors report
6.	Books of accounts including vouchers / voucher register as defined under the Act
7.	Income Tax Returns filed under the Income Tax Act, 1961
8.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
9.	Return of declaration in respect of beneficial interest in any share as per the Act
10.	Copy of newspaper advertisement or publications of statutory nature
11.	Compliance Reports received from any statutory authority
12.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means