

HEALTHIUM MEDTECH LIMITED
CIN No. U03311KA1992PLC013831

Regd. Office Address: 472/D, 4th Phase, 13th Cross Peenya Industrial Area
Bangalore -560058

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS & RECORDS

1. Background

1.1 The Securities and Exchange Board of India (“**SEBI**”) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”). In terms of Regulation 9 of Chapter III of the SEBI (**Listing Obligations and Disclosure Requirements**) Regulations, 2015, the Company is required to frame policy for preservation of documents.

Further, in terms of Regulation 30(8) of Chapter IV of the SEBI LODR Regulation the Company is required to disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

1.2 The Board of Directors (“**the Board**”) has adopted the following Policy on Preservation & Archival of Documents & Records (“**Policy**”) and the Board may amend this Policy from time to time.

2 Objective of the Policy:

The objective of this Policy is to define a process for preservation of documents and to further develop a guideline for archival of such documents, including those which are maintained in electronic form and are disclosed on the website of the Company.

The Policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business.

This Policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical records as per various statutory requirements and are subject to same degree of confidentiality and care.

3 Definitions:

“**Act**” means the Companies Act, 2013 including any amendment or modification thereof.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of documents has been prescribed.

“**Authorized Person**” means any person duly authorized by the Board.

“Archive” is an accumulation of historical records or the physical place/electronic mode where they are located. Archives contain primary source documents that have accumulated over the course of an organization’s lifetime, and are kept to show the function of that organization.

“Board of Directors” or **“Board”** means Board of Directors of Healthium Medtech Limited.

“Company” means Healthium Medtech Limited inclusive of its registered office and all branch offices.

“Committee” means committee of the Board of Directors or any other committee so constituted.

“Compliance Officer” means Company Secretary of the Company or the Officer appointed by the Board of Directors of the Company for the purpose of this Policy and regulation.

“Documents” means papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other records of the Company required under or in order to comply with the requirements of any applicable laws whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

“Electronic Records” means the electronic records as defined under clause Section 2(1)(t) of the Information Technology Act, 2000.

“Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Financial Year” shall have the same meaning as assigned under Section 2(41) of the Companies Act, 2013.

“Listed Entity” means an entity which has listed, on a recognized stock exchange(s), the designated securities issued by it or designated securities issued under scheme managed by it, in accordance with the listing agreement entered into between the entity and the recognized stock exchange(s).

“Maintenance” means keeping documents and records, either in physical or electronic form.

“Preservation” means maintenance of documents, files and documents in usable form. All other words and expressions used are not defined in this policy or the regulation, but defined in the Companies Act, 2013, the Securities Contracts (Regulation) Act 1956, the Depositories Act, 1996 and/or rules and regulations made thereunder, shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

4 Classification of Documents:

Documents shall be classified into the following categories:

- a. Mandatory under Governing Laws
- b. Non – Mandatory
- c. Documents which are required to be mandatorily preserved for stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in

respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with the Policy.

- d. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- e. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this Policy.

5 Modes of preservation:

- a. The Documents may be preserved either in physical form or electronic form.
- b. The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- c. The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- d. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
- e. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

6 Archival

- a. The information on Material Events shall be displayed on the website of the Company for Mandatory Hosting Period. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further Archival period of 3 (Three) years using appropriate technology. These archives shall be made available on a written request made to the Compliance Officer of the Company.
- b. Every function / unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
- c. Every function/ unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- d. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

7 Disposal of documents and records:

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or expunged in one of the following ways without the prior written approval of any one of the Key Managerial Personal of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- a. Confidential Papers - Confidential Papers shall be destroyed by making them unreadable.

- b. Non-Confidential Papers - Non-Confidential Papers shall be recycled
- c. Electronically Stored Records - Electronically stored records shall be erased or destroyed with the help of IT Department.
- d. Destruction of media records -Destruction of optical media records such as rewritable disks shall be destroyed by cutting, crushing or other physical means.

8 Roles and Responsibility of various Departmental Heads

The departmental heads must be familiar with this Policy and educate their department in this regard. They must restrict access to confidential records and information. They must coordinate in the destruction of the records as and when required.

9 Dissemination of the Policy

The Policy, as amended from time to time, shall be placed on the website of the Company, www.healthiummedtech.com .

10 Amendments and Modification in the Policy:

The Board may, subject to applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new policy as it may deem necessary. The Board may also establish further rules and procedures, from time to time, to give effect to this policy and to ensure governance.