



ANG LIFESCIENCES INDIA
LIMITED

PRESERVATION OF DOCUMENTS &
ARCHIEVAL OF DOCUMENTS

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

1. PREAMBLE:

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) has imposed certain obligations and disclosure requirements on all listed companies. One of the common obligations for all listed entities, pursuant to Regulation 9 of the Listing Regulations, being to formulate and put in place a Policy for Preservation of Documents classifying them into two categories:

1. Documents whose preservation shall be permanent; and
2. Documents to be preserved for not less than eight years.

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

Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information, which have been disclosed to stock exchange(s) under Regulation 30, 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.. Accordingly

this policy has been framed, keeping in view particularly the requirements of the Listing Regulations and the provisions of the Companies Act, 2013.

The Board of Directors of ANG Lifesciences India limited has approved the following policy ("Policy") of the Company for preservation of documents and records maintained by the Company in physical or electronic form.

2. PURPOSE OF THE POLICY

The primary object of this policy is to determine the period for preservation of records/documents of the Company based on their reference value and statutory requirements. In determining such period, the following aspects have been considered:

- Company's own information retrieval needs (reference value);
- Statutory requirements under respective statutes;
- Litigation requirements;
- Ease of retrieval;
- Optimal use of storage space and cost of preservation;
- Timely sanitation of obsolete records.

3. DEFINITION

In this policy, unless the context otherwise requires –

- (a) "Act" means the Companies Act, 2013 and the rules made there under, as amended from time to time.
- (b) "Listing Regulations" shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- (c) "Company" means ANG Lifesciences India limited.
- (d) "Document" includes all summons, notices, requisitions, orders, declarations, forms and registers, agreements and memorandum of understanding, papers, certificates, records, contracts, files, books, letters, tapes, CDs, DVDs, electronic storage devices, etc., whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- (e) "Key Managerial Personnel" or "KMP" shall have the same meaning described to it under the Act.

- (f) "Board" or "Board of Directors" shall mean the Board of Directors (including the Board committees) of the Company, as may be re-constituted from time to time.
- (g) "Financial Year" shall have the same meaning described to it under the Act.
- (h) "Electronic Form" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.
- (i) "Preservation" means to keep the documents preventing them from being altered, damaged or destroyed.

All other words and expressions used but not defined in this policy but defined in the Act, the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/ or the 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. DOCUMENTS AND THEIR PRESERVATION PERIODS

I. Documents to be Preserved Permanently

A. Under the Companies Act, 2013

1. Memorandum and Articles of Association as amended from time to time
2. Certification of Incorporation
3. Licenses, Registration Certificates, Permissions and Approvals
4. Register of Contracts or Arrangements in which Directors are interested
5. Register of Renewed and Duplicate Share Certificate
6. Register of Charges
7. Register and Index of Members
8. Documents relating to intellectual property rights such as patent applications and granted patents.
9. Minutes of the Board, Committees of the Board, and General Body meetings including meetings conducted through postal ballot
10. Resolutions passed by circulation
11. Audited Financial Statements
12. Documents relating to properties owned by the Company

B. Under the Listing Regulations

1. Listing Agreements executed with stock exchanges
2. Trading approval relating to listing of securities

3. Offer documents for public issue and private placement of securities filed with the SEBI

C. Others

Register of records and documents destroyed.

II. Documents to be Preserved for not less than 8 years from the date of its event

A. Under the Companies Act, 2013

1. Books of Accounts including vouchers and bills
2. The instrument creating a charge or modification.
3. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
4. Contracts (8 years after expiry), Interim Orders and Pleadings before Courts
5. Other Property-related documents
6. Register of buy back of Securities from the date of completion of buy-back
7. Annual Returns along with Annexures
8. Return of declaration in respect of beneficial interest in any share
9. Forms and returns filed with RBI/MCA or with any other statutory authority
10. Register of Transfer and Transmission of Shares, Debentures or other securities
11. Scrutinizer's Report on Postal Ballot and Annual General Meetings
12. Documents relating to appointment of Managerial Personnel
13. Personnel Documents
14. Insurance Policies/Claims under various policies
15. Non-Statutory Registers/Documents
16. Records related to Court/Arbitration/Judicial/Quasi-Judicial cases
17. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

B. Under Listing Regulations

1. All reports filed with stock exchanges from time to time
2. All disclosures of various events and press releases filed with the stock exchanges
3. Intimations of Board Meetings

C. Books of Accounts and Tax Records

Books of accounts and tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used or as per the requirement of the relevant statute.

D. Other Documents

In case of any other Documents not specifically covered above, their time for destruction shall be as specified in the relevant law. Employees must refer to the Legal Department of the Company for advice on destruction of any such Document.

5. ARCHIVAL OF DOCUMENTS

Documents maintained/preserved by the Company, as mentioned in the above paras, shall be maintained/ preserved in the following manner:

Documents maintained in physical form:

1. All information and/or documents pertaining to the current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to the preceding financial year shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation as mentioned above. The said records should be also maintained in such a manner that their retrieval is easy and quick.

Documents maintained in electronic form:

1. All documents pertaining to the current financial year and for the preceding financial year shall be maintained on server and backup be maintained on scheduled time and day.
2. Back up of all documents pertaining to the period prior to the preceding financial year shall also be maintained on server in good condition at least up to the minimum period specified for their maintenance / preservation. The said records should be also maintained in such a manner that their retrieval is easy and quick.

Documents made available on the website of the company:

After the expiry of time as specified above (i.e. five financial years preceding the current financial year), the information and/or document shall be removed from the main website. The Backup of said information and/or document, which is removed from the main website, shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years, the backup may be permanently removed from the server.

6 DISPOSAL OF DOCUMENTS

Records which no longer serve a useful purpose should be destroyed with the written approval of the respective Functional Head. Destruction as a normal administrative practice can be usually carried out if Documents are duplicated, unimportant or for short term use only.

The modes of destruction of records can include methods like shredding, pulping, recycling etc. or any other mode for electronic records, such that it leaves no possibility for reconstruction of the records and information contained therein.

7 EXCLUSION

In the event of a 'Litigation Hold' initiated by the Legal Department of the Company in connection with a statutory investigation or dispute before a court or tribunal, the Documents covered by the Hold shall not be destroyed until the hold is lifted by the Legal Department.

8. AMENDEMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.