

Paras Healthcare Limited

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY¹

¹ Approved by the Board of Directors in their meeting held on July 22, 2024

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

I. OBJECTIVE AND INTRODUCTION

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. The policy gives guide lines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

II. REGULATORY FRAMEWORK

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”) requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:

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

Regulation 30(1) of the Listing Regulations requires every listed entity to make disclosures to the Stock Exchange(s) of any events or information which, in the opinion of the Board of Directors of the listed company, is material. Further, Regulation 30(8) of the Listing Regulations requires listed entities to disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under Listing Regulations, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

This Policy shall come into force from the date of listing of the securities of the Company on recognized stock exchanges.

III. DEFINITIONS

- a. **“Archival”** means accumulation/storage of historical records on server/network or at a physical place.
- b. **“Board of Directors” or “Board”** shall mean the Board of Directors of the Company, as constituted from time to time.
- c. **“Documents” or “Records”** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices, Cloud Information, Share Drive etc., and the like as required to be maintained under any law or regulation for the time being in force.

- d. **“Preservation” or “preserve”** means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.
- e. **“Material Events”** means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity’s website.

IV. POLICY

Preservation:

- A. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the secretarial standards and the Listing Regulations and other applicable law, rules, regulations (collectively, called “Statutory Provisions”) and internal policies of the Company, in force.
- B. The relevant head of departments of the Company shall be responsible to ensure the maintenance and preservation of Documents and Records.
- C. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- D. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions (or such time period stipulated in the Listing Regulations and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant head of departments of the Company from time to time.

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 that 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.

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.

V. 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 purged in one of the following ways without the prior written approval of any one of the key managerial personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- (a) Recycle non-confidential paper records;
- (b) Shred or otherwise render unreadable confidential paper records; or
- (c) Delete or destroy electronically stored data.

VI. DISCLOSURE OF POLICY

This policy shall be disclosed on the Company's website.

VII. REVIEW, LIMITATION AND AMENDMENT

The Board of Directors shall review this Policy as may be deemed necessary and in accordance with any regulatory amendments.

In the event of any conflict between the Act and Listing Regulations or any other statutory enactments ("Regulations") and the provisions of this policy, the Regulations shall prevail over this policy.

Any subsequent amendment/modification in the Regulations, in this regard shall automatically apply to this policy.