



**POLICY ON PRESERVATION OF
DOCUMENTS
OF
GALAXY MEDICARE LIMITED**



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1. INTRODUCTION:

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) mandates listed entities to formulate a Policy for Preservation of Documents which shall be approved by the Board of Directors. Any subsequent modification and / or amendment to this Policy shall be subject to the approval of the Board of Directors.

Accordingly, the Company has framed a Policy with the objective of classifying various documents, records and registers for the purpose of determining the duration up to which such documents should be preserved. The Purpose of this Policy is to ensure that the Company complies with the requirement of a Policy for Preservation of Documents in accordance with Regulation 9 of the SEBI Regulations.

2. OBJECTIVE:

The Main Objective of this Policy is to ensure that all the Statutory Documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The Major Objectives of the Policy are:

- Identification of Statutory Registers and other Records of the Company which are required to be preserved.
- Identification and Categorization of the Statutory Registers and other Records to be maintained either for Eight Years or Permanently.
- Decide whether the Statutory Records and Documents are to be Preserved in Physical Form or in Electronic Form.
- After completion of 8 Years, for the Statutory Documents which are to be preserved for 8 Years only may be disposed of as per the Guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding Employees of the Company in understanding their obligations in retaining and Preserving the Documents and Records.
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3. DEFINITIONS:

- 1) “Act” means the Companies Act, 2013 and rules made there under, as amended from time to time.



- 2) **“SEBI Regulations”** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- 3) **“Company”** means Galaxy Medicare Limited.
- 4) **“Document”** includes Summons, Notice, Requisition, Order, Declaration, Form and Register, Agreements & Memorandum of Understanding 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.
- 5) **“Key Managerial Personnel” or “KMP”** shall have the same meaning described to it under the Act.
- 6) **“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.
- 7) **“Financial Year”** shall have the same meaning described to it under the Act.
- 8) **“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.

The Words or Expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein

4. CLASSIFICATION:

The Preservation of Documents shall be done in the following manner:

- a) Where there is a Period for which a Document is required to be preserved as per Applicable Law, for the Period prescribed by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such Period as the document pertains to a matter which is covered under the definition of current documents. An indicative List of the Documents and the Time-Frame of their Preservation is provided in **Annexure- I**.

5. MODES OF PRESERVATION:

The Documents may be preserved in



- a) Physical Form or
- b) Electronic Form.

The Official of the Company required to Preserve the document shall be Authorised Person who is generally expected to observe the compliance of Statutory Requirements as per Applicable Law.

The Preservation of Documents should be such as to ensure that there is no Tampering, Alteration, Destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The Preserved Documents must be accessible at all reasonable times. Access may be controlled by the Concerned Authorised Person with Preservation, so as to ensure integrity of the Documents and Prohibit Unauthorized Access.

6. DESTRUCTION OF DOCUMENTS:

The Period stated above is Minimum Retention/Preservation Period. Prior to actual destruction/disposal in terms of this Policy, the retention schedule may be reviewed by the Authorised Person if required due to an On-Going Business Use, Internal Audit Requirement or any other like reason. The documents may be destroyed as follows:

- (i) Recycle Non-Confidential Paper Records.
- (ii) Shred or otherwise render Unreadable Confidential Paper Records or
- (iii) Delete or Destroy Electronically Stored Data.

The Temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period by the Authorised Person in whose custody the Documents are stored after the Prior approval of the Board. Electronic Documents shall be removed after the expiry of Prescribed Retention Period from all Identified Electronic Repositories. A Register of the Documents Disposed/Destroyed shall also be maintained. It shall state the brief particulars of the Documents Destroyed, Date of Disposal/Destruction and the Mode of Destruction. The Entries in the Register shall be authenticated by the Authorised Person. The Format of the Register has to be in accordance with **Annexure II**.

7. EXCLUSION:

Documents/Records in respect of which any Investigation/Enquiry is Pending or in respect of which any Legal Proceeding is Pending or which is part of any Legal Dispute are not covered under this Policy.



8. MAINTENANCE OF DOCUMENTS IN INDEXED FORM:

For Ease of Record Reference, the Documents shall be Preserved in an Indexed Form. The Documents shall be indexed appropriately by the Authorised Person. The Index shall be updated as and when any changes occur in the Records. The Index shall be kept in Physical Form or in Electronic Form.

9. REVIEW:

This Policy has been approved by the Board of Directors of the Company. The Board, however, may review this Policy as and when it deems appropriate. This Policy is being formulated keeping in mind the Applicable Laws, Rules, Regulations and Standards in India. If there is an amendment in such Laws, Rules, Regulations and Standards, allowing Standards, then this Policy shall be deemed to have been amended to the extent of such Amendment. Also, if due to Subsequent Amendment in the Laws, this Policy or any part hereof becomes inconsistent with the Law, the Provisions of Law shall prevail and this Policy shall be deemed to be amended to that extent.

ANNEXURE I

DOCUMENTS TO BE PRESERVED

This Policy sets the Standards for Preservation of Documents of the Company, broadly classified in the following categories, which may be Preserved, in Physical and/or Electronic Mode

(i) CATEGORY A – DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The following Documents shall be Maintained and Preserved permanently by the Company. All Modifications, Amendments, Additions, Deletions to the said Documents shall also be Preserved Permanently by the Company.

- (a) Registration Certificates.
- (b) Statutory Registers required under Applicable Laws.
- (c) Polices, Charters and Codes of the Company.
- (d) Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.



- (e) Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- (f) Register of directors and Key Managerial Personnel.
- (g) Register of Renewed and Duplicate Share Certificates.
- (h) Register of Charges.
- (i) Register of Members along with the Index (Form MGT-1).
- (j) Register u/s 186 of the Companies Act, 2013 (Loan/ Guarantee/ Security or making an Acquisition of Securities) Form MBP-2.
- (k) Register u/s 187 of the Companies Act, 2013 (Investment held in the name of any other Person) Form MBP-3.
- (l) Register u/s 189 of the Companies Act, 2013 (Register of Contracts or Arrangements in which Directors are Interested as per Section 184 & 188 of the Act).
- (m) Property Card, Ownership, Records issued by Government Authority.
- (n) The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company.
- (o) Material Agreements/ Contracts, which, even if terminated, may have an impact on Business.
- (p) Orders/Judgement issued by Courts/Statutory Bodies and other Background Documents relevant for understanding such Orders.
- (q) Any other Document, Certificates, Statutory Registers that may be required to Preserved Permanently in terms the Companies Act, 2013 and/ or SEBI Regulations.

(ii) CATEGORY B – DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION.

The following Documents shall be maintained and preserved for a term not less than Eight Years after completion of the relevant transactions. All Modifications, Amendments, Additions, Deletions to the said Documents shall also be Preserved for a term not less than Eight Years.



- a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- b) Books of Accounts.
- c) Annual Returns (Copies of all Certificates and Documents required to be annexed thereto) As Per Companies Act, 2013.
- d) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India. The proof of the sending of the notices and agenda's, draft minutes, signed minutes, draft resolutions of Board Meetings / Committee thereof can be destroyed as per the Secretarial Standard-1.
- e) Disclosure of Interest received from Directors of the Company in the manner prescribed.
- f) Instrument creating a Charge or Modifying a Charge.
- g) Changes to the Memorandum and Articles of Association.
- h) Employment record for the Employees of the Company.
- i) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for Eight Financial Years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as Prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India. The Proof of the Sending of the Notices of AGMs/EGMs can be destroyed as per the Secretarial Standard-2.
- j) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for Eight Financial Years and may be destroyed thereafter with the approval of the Board of Directors, as Prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" Issued by the Institute of Company Secretaries of India.
- k) Documents as are required to be maintained under relevant Laws relating to Direct and In-Direct taxes



- (l) Marketing Documents.
- (m) Press Releases.
- (n) Legal Documents including but not limited to Contracts, Legal Opinions, Orders passed by various Courts and Tribunals, Documents relating to Cases Pending in any Court, Tribunal or Authority.
- (o) Any other Document, Certificates, Statutory Registers which may be required to be maintained and preserved for not less than Eight Years after completion of the relevant Transaction under the Companies Act, 2013 and/or SEBI Regulations.

(iii) CATEGORY C – GENERAL

In addition to the documents mentioned in Category 'A' and 'B' above, other Documents, Certificates, Forms, Statutory Registers, Records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the Existing Rules/ Procedures/ Practices of the Company or as per the Applicable Statutory/ Regulatory Provisions in this regard.

ANNEXURE II

Specimen Format of the Register of Documents Disposed of / Destroyed

| PARTICULARS OF DOCUMENT ALONG WITH PROVISION OF LAW | DATE AND MODE OF DESTRUCTION | INITIALS OF THE AUTHORISED PERSON |
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