



POLICY ON PRESERVATION AND ARCHIVAL OF  
DOCUMENTS (THE "POLICY")

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## PURPOSE OF POLICY

This Policy is framed on the basis of Regulation 9 read with Regulation 30(8) of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after referred to as "Listing Regulations"), and various provisions of the Companies Act, 2013 and other applicable laws.

Regulation 9 of the Listing Regulations requires every listed company to have a policy on preservation of documents/ records either in physical mode or electronic mode (the "Policy").

Further, Regulation 30(8) of the Listing Regulations requires the Company to frame the archival policy for website disclosures.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

## DEFINITIONS

- i. "Act" means the Companies Act, 2013, rules framed there under and any amendments thereto;
- ii. "Applicable Law" 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;
- iii. "Board" means the board of directors of the Company or its committees;
- iv. "Company" means Global Health Limited;
- v. "Documents" or "Records" means papers, notes, agreements, notices, agendas, circulars, declarations, minutes, registers, correspondences, challans, statutory registers, returns, forms or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent or received or kept in pursuance of the Act or under any law for the time being in force or otherwise maintained and preserved by the Company in physical or electronic form and such other records under various laws applicable to the Company;
- vi. "Electronic Form" means as defined in Information Technology Act, 2000 or as amended from time;
- vii. "Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- viii. "Policy" means this Policy of Preservation of Documents of the Company; and
- ix. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

Any other term not defined herein shall have the same meaning as prescribed to it under the Act, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.



## OBJECTIVE OF POLICY

~~This Policy mechanism provides the comprehensive framework for Preservation of Documents for a specified period of time to achieve the following objectives:~~

- a) Documents whose Preservation shall be permanent in nature and as per Applicable Law;
- b) Optimal use of storage space and cost of Preservation;
- c) To keep the important documents confidential;
- d) Statutory requirements under respective statutes;
- e) Systematic disposal/destruction of Company's non-current Records that have outlived their administrative usefulness;
- f) Identification of the Company's Records that are of continuing administrative and historical value to warrant their transfer to and Preservation in the Company's archives.

## SCOPE OF THE POLICY

For the purpose of achieving the above objectives, the Documents covered as per this Policy have been divided into two sections, i.e.

- i) the Records or the Documents that will be preserved permanently by the Company; and
- ii) the Records or the Documents that will be preserved for the period of at least 8 years after completion of the relevant transactions and not permanently.

This Policy applies to the Records maintained by the Company in any format or medium. The Records which are not required to be retained permanently shall be disposed off according to this Policy.

## AUTHORITY AND RESPONSIBILITY

The respective Function / Departmental heads of the Company shall be responsible for identification, maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

All staff and management of the Company shall assist in implementing this Policy as appropriate to their roles and responsibilities.

## CLASSIFICATION OF RECORDS

Based on the requirement and for the purpose of effective management, the period for which the Records of the Company shall be maintained have been classified into below categories:

- (A) Permanent Records: Documents so identified shall be permanently in the archives of the Company, and include such documents which:



- (a) represents a title to an immovable property or an intellectual property in which the Company an interest;
- (b) governs purchase of shares /investments in an entity in which the Company has an interest as of that date;
- (c) is a constitutional document;
- (d) is a record of statutory meeting / proceedings;

**(B) Records maintained for at least 8 (Eight) years** which have been so decided to be preserved by the Function / Department Heads either their own respective judgement or as required to be preserved by any specific Applicable Law.

**(C) Other Functional Documents/ Records**, which are of routine nature and as may be categorized as such by the Function/ Department Heads.

While prescribing different time period for Preservation of Records, the following aspects have been taken into account:

- a) Compliance with statutory and regulatory requirements.
- b) Satisfaction of the needs of SEBI/RBI/MCA inspectors to have access to certain Records.
- c) Satisfaction of the needs of internal and external auditors to have access to certain Records.

The Documents or Records not covered by this Policy shall be maintained by the Company for the time period specified for their Preservation under any statute or regulation by which they are governed.

## **LOCATION OF RECORDS**

Records shall be maintained in location as per the permission and approval provided under Act or under any other statute. The Records for which no specific place has been specified under any statute shall be maintained at the registered office of the Company or at any other place as may be approved by the Board, from time to time.

## **MODE OF PRESERVATION**

The Documents may be preserved in:

- Physical form; or
- Electronic Form.

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, other than disposal of Documents as permitted under this Policy.

The preserved Documents must be accessible at all reasonable times. Access shall be controlled by the authorised persons, so as to ensure integrity of the Documents and prohibit unauthorized access.



## ACCESS AND AUTHENTICITY

The Preservation of the Records of the Company is vital in order to ensure all current and future access to the Records. Preservation is also concerned with ensuring the authenticity of Records.

The Functional/ Departmental heads of the different levels and departments shall prepare a matrix for identifying persons who will allowed to access different kind of Records maintained and preserved by the Company under their jurisdiction. The Function / Departmental Head on a quarterly basis will confirm to the Compliance Officer of the Company status of compliance with this Policy.

## RECORD RETENTION SCHEDULE

The Records referred to in Annexure A of this Policy shall be maintained permanently and the Records which are required to be preserved permanently on the website of the Company shall be preserved in line with the Website Archival Policy of the Company.

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of Records consumes time, space and equipment use, therefore disposal will aid efficiency.

The Company shall maintain a register of Preservation and disposal of Records in the custody of the Compliance officer of the Company, wherein the brief particulars of the Records preserved and/or removed from the location after the expiry of its Preservation period shall be entered. The register of Preservation and disposal of Records shall contain the following columns:

- a) Item Number;
- b) Brief Particulars of the Records preserved/ disposed of;
- c) Date of creation of the Record;
- d) Date of removal from the register;
- e) Whether preserved permanently or not; and
- f) Mode of destruction

This register of Preservation and disposal of Records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or Electronic Form.

## RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the Records preserved as per this Policy. The purpose of the appraisal process is to ensure the Records are examined at the appropriate time to determine whether or not they are



worthy of archival Preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed. The appraisal of Records shall be undertaken only after the approval of the Board of the Company.

## **COMPLIANCE OFFICER**

The Company Secretary of the Company shall be the Compliance Officer of the Company.

## **ARCHIVAL OF DOCUMENTS**

- (a) In accordance with the provisions of the aforesaid Listing Regulations, the Company shall ensure that all the relevant information shall be hosted on the Company's website for a period of 5 years. Thereafter, the disclosures of information and events communicated to the stock exchanges will be retained on the website of the Company in the section entitled "Archives" for a minimum period of [2] years. Subsequently, such disclosures shall be removed from the Company's website.
- (b) All information required to be uploaded on the Company's website in pursuance of any other statute / legislation / regulation, shall be hosted on the Company's website, in the form, manner and for such period as may be mandated by that statute / legislation / regulation etc.
- (c) In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of [1] year from the date of uploading or more if deemed necessary by the Chief Financial Officer/Compliance Officer.
- (d) The Company Secretary and Compliance Officer and/or Chief Financial Officer shall have the discretion to host any of such documents/information on the website of the Company for such additional period as they deem fit on a case to case basis.
- (e) Any information/ form/ return/ document etc. disclosed on the website, may be removed/ deleted from the website after such disclosure period.

## **EFFECTIVE DATE AND POLICY ENFORCEMENT**

The above said Policy is approved by Board in its meeting held on 10.09.2021 and shall be effective from date of the approval.

## **DISCLOSURE OF THE POLICY**

The necessary disclosure about the Policy will also be made as per requirements of the Listing Regulations and the Act.



**REVIEW OF THE POLICY**

~~This Policy shall be subjected to review, if necessary. Any change / amendments in applicable laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change / amendments to this Policy shall be approved by the Managing Director/ Chief Executive Officer of the Company.~~

