



KASHYAP TELE-MEDICINES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS
{UNDER REGULATION 9 OF THE SEBI (LISTING OBLIGATIONS AND DISCLOSURES
REQUIREMENTS) REGULATIONS, 2015}

1. Preface:

In compliance with the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") which requires every listed company to have a Policy for Preservation of Documents ("hereinafter referred to as "Policy"), approved by its Board of Directors, classifying them under below categories:

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

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

The Board of Directors (hereinafter referred to as "the Board") of Kashyap Tele-Medicines Limited ("Company") has approved this Policy for Preservation and Disposal of documents/records maintained by the Company either in physical mode or electronic mode (hereinafter referred to as "the Documents").

2. Purpose:

The purpose of this Policy is to identify the documents to be preserved, mode of preservation, time for which the documents are to be preserved and to ensure that all the statutory documents are preserved in compliance with the relevant laws.

The Policy establishes the guidelines for management, retention, preservation and destruction of documents, both in physical form and electronic form by the Company.

3. Applicability:

This Policy shall be applicable to the Company with effect from **1st December, 2015**.

4. Definitions:

"**Act**" means the Companies Act, 2013 and Rules made thereunder, as amended.

"**Applicable Law**" means any existing or new enactments, circulars, Laws, Rules, Regulations issued by the Government of India/State Governments or laws enacted by any overseas country which has an impact on the Company's businesses as also rules, regulations or standards which are issued by any statutory bodies in India and governing the Company.

"**Authorized Person**" means any person duly authorised by the Board.

"Board" means the Board of Directors of the Company or any of the Committees constituted by it.

"Company" means Kashyap Tele-Medicines Limited.

"Documents" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, 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 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 or access thereto.

"Maintenance" means keeping Documents, either physically or in electronic form.

"Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

"Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

"SEBI" stands for the Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act 1992 to regulate securities market.

"Stock Exchange" means BSE Limited where equity share of the Company are listed.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

5. Classification:

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

- (a) Documents whose preservation shall be permanent in nature;
- (b) Documents with preservation period of not less than eight years after completion of the relevant transactions.
- (c) In case of any other Documents, for such period as deemed appropriate and necessary by the Board or any authorized person in view of its relevance; provided that in general such a document may be preserved for a period of 5 years from the date of its origination.

An indicative list of the Documents and the timeframe of their preservation is provided in **Annexure I**.

6. Mode of Preservation:

The Documents may be preserved in

- a. physical form; or
- b. electronic form

The officer of the Company required to preserve the Document shall be an Authorized Person, who is generally expected to observe the compliance of requirements of 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 Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

7. Custody of the Documents:

Subject to the Applicable Law, the custody of the Documents shall be with the Authorized Person. Where the Authorized Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his/her possession under the Policy. The Board may authorize such other person as it may deem fit as the Authorized Person.

8. Disposal of Documents:

The Documents may be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the documents are stored, after the prior specific approval of the Managing Director / Whole Time Director of the Company / any other person authorized by the Board of Directors from time to time and as per Applicable Law pursuant to which the documents have been preserved. The brief details of the Documents destroyed by the Company shall be recorded in the Register of Disposal of Records to be kept by Employees who are disposing of the document in the format prescribed in **Annexure II**.

9. Disclosures:

The Company shall disclose the Policy on its website.

10. Amendment:

The Board shall have the authority to amend or modify this Policy, to align with any amendments made to the Listing Regulations or such other circulars, SOP's, guidelines, standards or regulations issued by the SEBI, Stock Exchange or any other statutory authority or as and when deemed fit.

In the event of any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws then this policy shall stand modified to the extent applicable.

In the event of inconsistency of this Policy with any statutory provisions, then the relevant provisions of such applicable law shall prevail upon the provisions of this Policy.

Indicative list

SR. NO	PARTICULAR
A	PERMANENT PRESERVATION
a)	The Memorandum and Articles of Association of Company
b)	Certificate of Incorporation and subsequently amended certificates
c)	Minutes books of Board, General Meetings and Committee Meetings
d)	Statutory Registers
e)	License and Permissions
f)	Statutory Forms and disclosures except for routine compliance
g)	Scrutinizers' Reports
h)	Policies and codes of the Company
B	PRESERVATION FOR MINIMUM 8 YEARS:
a)	Annual Returns
b)	Annual Reports
c)	Notice, Agenda papers and supporting documents of Board / Committee Meetings
d)	Notice, Agenda papers and supporting documents of General Meetings
e)	Attendance Registers
f)	Circular Resolutions
g)	All notices pertaining to disclosure of interest of directors
h)	Books of accounts, financial statements etc.
i)	Non Mandatory Registers
C	OTHERS:
	As per applicable law

