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POLICY FOR PRESERVATION OF DOCUMENTS

1. PREFACE AND OBJECTIVE:

NOVATEOR RESEARCH LABORATORIES LIMITED (“Company”), being a listed entity, is obligated to frame a policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”) as amended from time to time.

As per Regulation 9, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode.

In accordance with the above Regulation 9, the Company has framed a Policy for Preservation of Documents (hereinafter the “Policy”). The Policy is framed in line with the existing provisions of LODR. Any future changes in the LODR will, ipso facto, apply to this Policy. The Policy has been approved by the Board of Directors in its meeting held on 15th July, 2019.

2. DEFINITION

“**Act**” shall mean the Companies Act, 2013 and the Rules framed there under, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**Board**” means the Board of Directors of NOVATEOR RESEARCH LABORATORIES LIMITED, as constituted from time to time.

“**Company**” means NOVATEOR RESEARCH LABORATORIES LIMITED.

“**Compliance Officer**” means Company Secretary of the Company or such other officer as designated with such responsibility by the Board of Director.

“**Electronic Form**” shall mean any record/documents/information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device as permitted by the applicable law for the time being in force.

“Key Managerial Personnel” (KMP) means KMP as defined under the provisions of Companies Act, 2013 as amended from time to time.

“Policy” means Policy for Preservation of Documents.

“Documents” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

“Regulations” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re- enactment thereof.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, in the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable laws or regulations to the extent applicable to the Company and as amended from time to time.

3. 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) Annual Reports of the Company.
- (b) 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.
- (c) 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.
- (d) Any other document, certificates, statutory registers that may be required to be 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 LODR, as amended from time to time.
- (b) Documents/Information submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules there under.
- (c) Books of Accounts.
- (d) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013.
- (e) 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.
- (f) 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.
- (g) 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.
- (h) 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.

4. RESPONSIBILITY

The respective departmental heads of the Company will be responsible for maintenance, preservation and destruction of the documents in respect of areas of operations falling under their charge of each of them in terms of this policy.

5. MODE OF PRESERVATION

Documents may be preserved either physically or in electronic form as permitted by the law for time being in force.

6. DESTRUCTION OF DOCUMENTS

The documents preserved may be reviewed every year or according to the need by the respective departmental Head and necessary action is to be taken for destroying documents which are due for disposal.

Preserved documents may be destroyed in such mode under instructions as approved by the Managing Director. Destruction of documents as a normal administrative practice will also be followed for documents which are duplicate / unimportant / irrelevant. This applies to documents maintained in both physical and electronic form.

7. GENERAL

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

8. AMENDMENT TO THE POLICY

Management is authorized to amend or modify this Policy at its discretion. However, no such amendment or modification shall be inconsistent with the applicable provisions of any laws/ regulations for the time being in force.
