



SAHAJANAND MEDICAL TECHNOLOGIES LIMITED

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

Name	Preservation of Documents & Archival Policy
Approval Date	May 29,2025
Version	Version 1
Effective date of the Policy	May 29,2025



Introduction

The Board of Directors ("**Board**") of Sahajanand Medical Technologies Limited ("**the Company**") have adopted this Policy for preservation/retention of Documents & Archival ("**the Policy**") in accordance with Regulation 9 and 30(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time ("**Listing Regulations**").

Purpose

This Policy contains guidelines for archival of Disclosures/ announcements made on the Stock Exchanges, identifying Documents that need to be maintained, the period of their preservation and destruction/disposal.

Definitions & Interpretations

All the words and expressions used herein and not defined shall have the same meaning as ascribed to them in the Companies Act 2013 ("**Act**"), Listing Regulations, SEBI Act, 1992, as amended, or rules and regulations made thereunder and any other relevant legislation applicable to the Company.

Periodicity of Preservation of Documents

The Company is required to maintain certain types of corporate records for a specified period under applicable corporate/ securities laws, including but not limited to the Listing Regulations and the Act ("**Applicable Laws**"), as identified below.

- A) Documents to be preserved permanently (Indicative list provided Annexure I).
- B) Documents with preservation period of not less than 8 years after completion of the relevant transactions (Indicative list provided in Annexure II).

Records may be preserved for prescribed periods or longer periods of time where required under any other Applicable Laws.

Archival of Disclosures under the Listing Regulations

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the Regulation 30 of the Listing Regulations, and such disclosures shall be hosted on the website of the Company for a minimum period of 5 years.

Thereafter, disclosures will be shifted to the "**Archive**" section of the website, where it shall be retained for another period of minimum 1 year and then be destroyed or deleted, unless required to be preserved further in compliance with statutory laws.



Subsequently, anyone intending to review the archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.

Mode of maintenance

The Company shall maintain these documents either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company. All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under applicable law.

Destruction of Documents

Unless required to be preserved for a particular purpose like litigation or regulatory directive, after the expiry of the statutory retention period, the preserved documents may be destroyed by the respective Department after assessing the need of the documents.

Normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

The documents may be destroyed as follows:

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

Disclosure

The Policy shall be uploaded on the website of the Company at www.smtpl.com.

Review and Amendment

- i) This Policy is framed based on the provisions of the Listing Regulations. In case of any subsequent changes in the provisions of the Listing Regulations, which makes any of the provisions in the Policy inconsistent with the Listing Regulations, then the provisions of the Listing Regulations would prevail over the Policy.
- ii) Any change, amendment, or addition to this Policy shall require prior approval of the Board. However, the Company Secretary is authorized to make amendments to this Policy to give effect to any changes or amendments notified by the Securities and Exchange Board of India. Such amendments shall be placed before the Board for noting and ratification at its subsequent meeting.
- iii) The Company Secretary in coordination with Chief Financial Officer shall review this Policy periodically and recommend any proposed changes to the Board for approval.



Limitation

In the event of any conflict between the provisions of this Policy and the Listing Regulations or the Act or any other relevant legislation/ regulation applicable to the Company, the provisions of the Listing Regulations or the Act or such other relevant law / regulation shall prevail over this Policy.



Annexure I

Documents to be Preserved Permanently

- Memorandum/ Articles of Association, as amended from time-to-time
- Certificate of incorporation, Certificate of Change of Name, if any
- Certificate of commencement of business
- Licenses, certificates, approvals and other such documents issued by Central/State Government and any other statutory and/or regulatory body (in case of non- expiry licenses)
- Orders, judgements of judicial and Quasi-judicial authorities
- Policies, Charters and Codes of the Company (latest version)
- Minutes of the meetings of the Board of Directors and of its committees
- Minutes of all meetings of shareholders
- Ballot papers and related papers
- Register of charges
- Register of Members (including foreign member register)
- Register of Directors and Key Managerial Personnel
- Office copies of Notices, scrutinizer's report and other documents related to meetings of shareholders/ creditors of the Company
- Register of renewed and duplicate share certificate
- Register of loans, guarantees, security and acquisition made by the Company
- Register of investments made by the Company not held in its name, if any
- Register of Contract or Arrangements
- Register of Employee Stock Options Scheme
- Applications and approvals for issuance and listing of securities
- Press releases, publicly filed documents
- Land title deeds/documents/receipts
- Documents in relation to Intellectual Property Rights of the Company
- Other Documents required to be permanently preserved under any applicable law/regulation/statute etc.



Annexure II

Documents to be Preserved for not less than 8 years

- Notice, agenda and notes to agenda of meetings of the Board and its Committees
- Office copies of general meeting Notices, scrutinizers report and other related papers of the company
- Attendance registers of the meetings of the Board and its Committees
- Register of Deposits
- Books of Accounts including relevant books & papers and financial Statements
- Tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal against any claim made by the relevant tax authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later
- Disclosures/ notices by a director of his interest
- Instrument creating a charge or modification
- Annual return and copies of all certificates and documents required to be annexed thereto
- Register of debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company
- Other documents as required to be preserved for not less than 8 years under any applicable law/regulation/statute, etc.