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**POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

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**Effective From** : **October 10, 2019**  
**Last Amended** : **May 8, 2026**

## 1. Preamble

This Policy on Preservation and Archival of Documents (“**the Policy**”) has been formulated and adopted by the Board of Directors of Artemis Medicare Services Limited (“**AMSL**”/ “**the Company**”) in pursuance to Regulation 9 read with Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Listing Regulations**”).

The Board of Directors of the Company, at its meeting held on October 10, 2019, approved the Policy on Preservation of Documents and the Policy on Archival of Documents, effective from that date. In order to consolidate these policies into a single comprehensive policy, the revised policy has been approved and adopted by the Board at its meeting held on May 8, 2026.

## 2. Objective & Scope

The objective of this policy is to guide employees of the Company in ensuring safe-keeping and safeguarding the documents for both statutory compliance and internal purposes, while avoiding superfluous inventory of documents by providing for their appropriately disposal/ destruction/ archival, as the case may be.

This Policy not only covers the various aspects of preservation of the documents but also their archival and safe disposal/ destruction of the documents.

## 3. Definitions

- (a) “**Act**” means the Companies Act, 2013.
- (b) “**Applicable Laws**” means any law, rules, circulars, guidelines or standards binding on the Company, under which the preservation of the Documents has been prescribed.
- (c) “**Authorized Person**” means the functional head of the concerned department or any other person duly authorized by the Board or the Managing Director(s) of the Company.
- (d) “**Board of Director**” or “**Board**” means the Board of Directors of the Company.
- (e) “**CCD**” means the Chief of Concerned Department.
- (f) “**Company Secretary**” means the Company Secretary of the Company.
- (g) “**Documents**” shall have the meaning as defined in Section 2(36) of the Act.
- (h) “**Electronic Records**” shall have the meaning as defined in Section 2(1)(t) of the Information Technology Act, 2000, as amended from time to time.

- (i) **“Electronic Form”** shall have the meaning as defined in 2(1)(r) of the Information Technology Act, 2000, as amended from time to time.
- (j) **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed, other than as permitted by this Policy.

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

#### **4. Classification of Documents**

4.1. Based on the preservation period, Documents shall be classified into the following category:

- **Class A Documents:** Documents that are required to be preserved permanently, either under Applicable Laws or as determined by the Authorised Person.
- **Class B Documents:** Documents that are required to be preserved for a period of not less than 8 (eight) years, either under Applicable Laws or as determined by the Authorised Person.
- **Class C Documents:** Documents other than Class A and Class B Documents.

An illustrative list of Documents, along with their classification and the time frame for their preservation, has been set out at *Annexure I*.

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.

4.2. As a general principle, a Document should be permanently preserved, even beyond the requirements of Applicable Laws, where the Document has a particular legal, historical or business significance and is of such nature that it should be available to the Company for the long term.

4.3. In the event of any inquiry or investigation by any regulatory, judicial or governmental authorities, Documents shall be preserved until the conclusion of such inquiry or investigation, irrespective of the completion of the minimum preservation period.

4.4. Each employee shall abide by the Policy. Each Authorised Person shall guide the employees in his department and ensure that they identify and classify Documents and take appropriate action with regard to their Preservation in accordance with this Policy.

4.5. In case of any doubt as to the appropriate classification, the employee shall refer the same to the relevant Authorised Person. In case of ambiguity as to the classification, the Authorised Person may refer the matter to the CCD for final decision of the classification of the relevant Document.

4.6. It is further clarified that Documents may be subject to periodic internal review and may accordingly be reclassified appropriately by the Authorised Person and/ or the CCD.

4.7. As a general rule, a particular Document shall be considered to belong to a particular department if it originated in such department or if it comes under the scope of responsibility of the head of department of such department. In case a Document is part of two or more departments or if there is ambiguity as to the department to which a particular Document belongs, the matter may be referred to the CCD, whose decision shall be final.

4.8. Each Authorised Person shall be required to preserve the Document pertaining to its department. The Company Secretary shall be responsible for the overall compliance of the Policy. Each Authorised Person and CCD shall act under this Policy in consultation with the Company Secretary and shall perform all acts and extend all cooperation to the Company Secretary to enable him/ her to ensure compliance with the Policy and the SEBI Listing Regulations.

## **5. Mode of preservation**

5.1. The Documents may be preserved in:

- Physical form or
- Electronic form.

5.2. 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.

5.3. 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.

## **6. Custody of Documents**

6.1. Subject to the Applicable Laws, the custody of the Documents shall be with the relevant Authorised Person. Where the Authorised Person tenders his resignation or is transferred from one location of the Company to another or is otherwise no longer employed with the Company, 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 possession under the Policy to the new head of such department (or in the absence of any head of department, to the CCD). Information of the cessation or transfer of the Authorised Person shall also be intimated to the CS and information technology department of the Company.

- 6.2. The Authorised Person will co-ordinate with the IT Department of the Company to ensure Preservation of Documents in electronic form, as appropriate.
- 6.3. Notwithstanding anything contained elsewhere in the Policy but subject to the requirements of Applicable Laws, the Authorised Person may (subject to final approval from the CCD) permit other means of storage including usage of a third party service provider or a centralized system of storage for the Preservation of Documents.
- 6.4. Notwithstanding anything contained herein, where any Documents are required to be maintained at the registered office of the Company under Applicable Laws, such Documents shall be maintained at the registered office.

## **7. Destruction of Documents**

- 7.1. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both physical and electronic Documents.
- 7.2. Documents shall be disposed as follows:
  - 7.2.1. Class A Documents, being permanent in nature, shall not be disposed of.
  - 7.2.2. Class B Documents may be disposed of after the expiry of the period prescribed under Applicable Laws, with the prior approval of the Authorised Person or, where required under the Act or any other Applicable Laws, with the approval of the Board.
  - 7.2.3. Class C Documents may be disposed of with the approval of the Authorised Person.
- 7.3. The Board/ Authorised Person, as the case may be shall exercise due diligence while destroying any Documents, including seeking confirmation from other relevant departments or external consultants, to the extent necessary.
- 7.4. 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.
- 7.5. The format of the register has to be in accordance with ***Annexure-II***.
- 7.6. The functional head of the IT department shall make appropriate provision for back up for Electronic Records.
- 7.7. The relevant Authorised Person shall forthwith inform the CCD and the CS of any damage or inadvertent destruction of any Document.

## **8. Archiving of Documents which are hosted on the Company's website**

Recognizing the need to ensure the preservation and availability of the Company's Document after the lapse of their required preservation period as set out under the SEBI Listing Regulations and hereunder, for any legal, administrative, and historical purposes, the Company adopts the following archival policy in respect of Documents hosted on its website:

- 8.1. All disclosures submitted to the Stock Exchanges, where the securities of the Company are listed, pursuant to Regulation 30 of the SEBI Listing Regulations, shall be hosted on the Company's website for a minimum period of 5 (five) years and may thereafter be removed from the website with the approval of the Key Managerial Personnel of the Company.
- 8.2. Audio/ video recordings of post-earnings or quarterly calls shall be hosted on the Company's website for a minimum period of 2 (two) years, and transcripts of such calls shall be hosted for a minimum period of 5 (five) years. Thereafter, they may be removed from the website with the approval of the Key Managerial Personnel of the Company.
- 8.3. All disclosures, information, or documents not covered under Clauses 8.1 and 8.2 shall be hosted on the Company's website for the period specified under the Act, SEBI Listing Regulations, or other Applicable Laws. Where no specific period is prescribed, such disclosures, information, or documents shall be hosted for a period of 5 (five) financial years immediately following the financial year to which they relate, unless otherwise decided by the Key Managerial of the Company.
- 8.4. Backups of all disclosures, information, or documents removed from the Company's website pursuant to Clauses 8.1, 8.2, and 8.3 shall be maintained in electronic form, in accordance with the decision of the Authorised Person.

## **9. Miscellaneous**

- 9.1. For ease of record reference, the Documents may be preserved in an indexed form.  
  
The index may be kept in physical form and/or in Electronic Form.
- 9.2. The physical Documents preserved may be converted, whenever required or felt necessary, into Electronic Form to ensure ease in maintenance of Documents and efficient utilization of space. This will be done after obtaining prior approval of the Authorised Person.
- 9.3. Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form shall be considered for every purpose.
- 9.4. A copy of this Policy shall be uploaded on the website of the Company.

9.5. In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule or Regulation, the law, rule or Regulation will take precedence over this Policy until such time as this Policy is changed to conform to the law, rule or Regulation.

**10. Modification in the Policy**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Act and SEBI Listing Regulations. The Company Secretary is also authorized to make amendments in this Policy, where there is any statutory changes necessitating the amendment in the Policy.

**Indicative List of Documents**➤ **Class A Documents**

Sl. No.	Document
<b>As per the Companies Act, 2013</b>	
1.	Certificate of Incorporation/ Commencement of Business
2.	The Memorandum & Articles of Association
3.	Minute Books of General Meetings, Board and Committee Meetings
4.	Affidavit from the subscribers to the memorandum and from persons named as the first directors
5.	Register of Members (MGT-1)
6.	Register of Renewed and Duplicate Share Certificate (SH-2)
7.	The Foreign Register of Members
8.	Register of Charges (CHG-7)
9.	Register of particulars of loans and guarantee given, securities provided & acquisition of securities made by the Company (MBP-2)
10.	Register of Investments not held in its own name by the Company (MBP-3)
11.	Register of Contracts with related party and contracts and Bodies etc. in which Directors are interested (MBP-4)

➤ **Class B Documents**

Sl. No.	Document
<b>As per the Companies Act, 2013</b>	
1.	Instrument creating a charge or modification (eight years from the date of satisfaction of charge)
2.	Register of debenture holders or any other security holders (eight years from the date of redemption of debentures or securities) (MGT-2)
3.	Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (eight years from date of filing with the Registrar)
4.	Foreign register of debenture holders or any other security holders (eight years from the date of Redemption)
5.	Books of Account together with relevant vouchers (Not less than eight financial year)
6.	All notices pertaining to disclosure of interest of directors (MBP-1) for a period of eight years from the end of the financial year to which it relates)
7.	Register of deposits (not less than eight years from the financial year in which the latest entry is made in the register)
8.	Books and Documents relating to the issue of share certificates, including the blank forms of share certificates (not less than thirty years and in case of disputed cases, shall be preserved permanently)

9.	The postal ballot and all other papers relating to postal ballot including voting by electronic means, (as long as they remain current or for eight financial years), whichever is later)
<b>Secretarial Standards</b>	
10.	Attendance Register for Board and Committee Meetings (eight financial years from the date of last entry made therein) (SS-1)
11.	Copies of Notices, Agenda, Notes on Agenda and papers related to Board Meeting. (as long as they remain current or for eight financial years, whichever is later) (SS-1)
12.	Office copies of Notices, Scrutiniser's report, and related papers (as long as they remain current or for 8 financial years, whichever is later) (SS-2)

**The format of the register of Documents disposed/ destroyed:**

Particulars of document alongwith Provision of Applicable Laws	Date and Mode of Destruction	Initials of the Authorised Person