

Policy on Preservation & Archival of Documents & Record

I. Background

The Securities and Exchange Board of India has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Regulations”). The SEBI Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Policy on Preservation & Archival of Documents & Record (“Policy”) is being framed and implemented.

II. Objective of the Policy

In accordance with the SEBI Regulations, the Company has formulated this Policy on Preservation & Archival of Documents & Record. The Policy contains guidelines for maintenance, preservation and disposal of Documents and Records of the Company.

III. Regulatory Framework

1. The Securities and Exchange Board of India has on September 2, 2015 notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Regulations”) which came into effect on December 1, 2015.
2. Regulation 9 of the SEBI Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:
 - 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.
3. Regulation 30(8) SEBI Regulations requires listed entities to disclose on its website all such events or information which has been disclosed to stock exchange(s) under SEBI regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.
4. Accordingly, this policy is framed as per the requirements of the SEBI Regulations.

IV. Definitions

“**Archival**” means accumulation/storage of historical records on server/network or at a physical place.

“**Company**” shall mean Quick Heal Technologies Limited.

“**Documents**” or “**Records**” mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.

“**Preservation**” or “**preserve**” means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

“**Policy**” shall mean the Policy on Preservation & Archival of documents and records.

“**SEBI Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modifications or re-enactments thereof for the time being in force.

V. Scope and Applicability

1. The Policy covers all relevant Documents and Records generated during the course of operations of the Company.
2. The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

VI. POLICY

1. Preservation

- a. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, the Listing Agreement and the SEBI Regulations and any all other applicable law, rules, regulations, internal policies of the Company, in force.
- b. The relevant Head of Departments of the Company shall be responsible to ensure the maintenance and preservation of Documents and Records.
- c. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be covered by **Category A**. All the documents and records in Category A shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- d. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions shall be covered by **Category B**. The Documents and Records to be covered under Category B shall be determined by the relevant Head of Departments of the Company from time to time.

2. Archival

- a. **Financial Data:** The Investor’s web pages provide access to financial documents/information for existing and potential stakeholders which are regulatory in nature, including annual reports and financial results.

- b. **Press Releases and News Announcements:** The Company's website provides information/ data which is relevant to the media, researchers or investors who seek information on the growth of the company and significant events of the past. This shall also include events or transactions or information which is disclosed by the Company to the Stock Exchanges in terms of Regulation 30 of the SEBI Regulations.
- c. The aforesaid information shall be displayed on the website of the Company for a period of five years from the date of its publication. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further period of 5 (five) years using appropriate technology. These archives shall be made available on a written request made to the Compliance Officer of the Company.
- d. Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
- e. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- f. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

VII. DISPOSAL OF DOCUMENTS AND RECORDS:

The Documents and Records whose preservation is no longer required or upon the expiration of the specified period of time for preservation may be discarded or disposed off in accordance with procedure specified by law in this behalf and where no such procedure is specified, then in accordance with the standard operating procedures applicable to the respective departments.

VIII. REVIEW & AMENDMENT

- 1. The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Board of Directors has the right to alter, modify, add, delete or amend any of the provisions of this policy at its discretion and the new policy shall be displayed to the stakeholders.
- 2. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

IX. DISEMINATION OF THE POLICY:

The Policy, as amended from time to time, shall be placed on the website of the Company.

List of Documents under Category A

<u>Document</u>	<u>Retention Period</u>
Books of Accounts	8 years
Tax Records	8 years
Incorporation Documents	Permanent
Annual reports	Permanent
Audit Reports	Permanent
Minutes of the Board/Committee Meetings	Permanent
Minutes of General Meetings	Permanent
Statutory Registers	Permanent
Legal Opinions	Permanent
Land records	Permanent

List of Documents under Category B

<u>Document</u>	<u>Retention Period</u>
Contracts	3 years
Records & returns filed with ROC & SEBI	8 years
Other Secretarial records	8 years
Non – disclosure Agreements	3 Years
Other Tax records	5 Years
Employment Records	8 years
Board of Directors	3 years
Press Release	5 years
Intellectual Property Rights	For the life of such IPR
Any other secretarial documents not specified above	5 years
Litigation	Final disposal + 3 years
Show Cause Notices	3 years