

<b>Policy Title</b>	<b>Policy for Preservation of Documents</b>		
<b>Policy number</b>		<b>Policy effective date</b>	14-March-2022
<b>Policy owner</b>	Company Secretary	<b>Email</b>	<a href="mailto:Ramakrishna.kasturi@aragen.com">Ramakrishna.kasturi@aragen.com</a>
<b>Policy revision approving authority</b>	Chief Executive Officer / Executive Director of the Company		

#### Document change history

Policy No. (with version)	Date of approval	Effective date	Comments
V.1	14-Mar-2022	14-Mar-2022	Formulation of the Policy

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## 1. Background

Aragen Life Sciences Private Limited (“**Company**”) issued non-convertible debt securities in February 2022 which are listed on the BSE Limited (“**BSE**”). The Company is obligated to comply with all relevant rules and regulations framed by the Securities and Exchange Board of India (“**SEBI**”) including the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulations**”).

This Policy is formulated pursuant to Regulation 9 of the LODR Regulations that mandates every listed company to have a policy on the preservation of documents.

This Policy specifies the documents that are required to be maintained and preserved in the Company considering their importance to the organization and to the stakeholders including the Government and Regulatory bodies and sets the standards for their maintenance and preservation.

This Policy is effective from 14<sup>th</sup> March, 2022 i.e., from the date of approval of the Board of Directors of the Company.

## 2. Definitions:

“Documents” refers to all company records which include papers, files, registers, writings, memos, manuscripts, communications, agreements, sale deeds, conveyance licenses, opinions, press releases, circulars, judgments, orders, approvals, registration certificates, building plans, etc. generated or received or maintained by the Company in the course of its business either in physical form or in electronic form produced by a computer or by any other device but not limited to emails and attachments, scanned papers, word documents, presentations, spreadsheets, databases, pictures, graphics required to be maintained and preserved by the Company in physical or electronic form in terms of securities laws as defined under Regulation 2(1)(zf) of the LODR Regulations and other applicable laws & statutes.

## 3. Document Preservation

The Documents of permanent nature as listed in **Annexure 1** hereto including amendments made thereto from time to time, shall be maintained and preserved permanently in physical form and/or in an electronic form as permitted by applicable law.

Certain Documents including amendments made thereto from time to time, listed in **Annexure-2** shall generally be preserved for an archival period of not less than eight years in physical form and/or in an electronic form as permitted by applicable law, provided that such documents shall be preserved for shorter/extended periods as may be specified/required by law or as advised by the Legal department if such documents are relevant to any litigation.

## 4. Responsibilities, Reporting

The respective Heads of Strategic Business Units (SBU)/Functional Heads of the Company shall be responsible for maintenance, preservation, and destruction of the Documents in terms of this Policy following the Standard Operating Procedures (SOPs) in this regard applicable to such department as approved by the internal Policy Committee.

The SOPs shall be put in place within a month of this Policy.

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The respective Head of SBU/Functional Head shall affirm compliance of this Policy as part of statutory compliance certificate in the specified template to the legal function for reporting to the Board.

#### **5. Guidelines for the development of SOPs**

The SOPs shall prescribe detailed procedures for maintenance, preservation, and destruction of The Documents that include among others,

- the way the Documents are to be prepared to ensure them to be a full and accurate record of the transactions;
- classification, filing, labelling, indexing, and preserving the Documents to avoid any damage;
- maintenance of appropriate registers for preservation and destruction of The Documents;
- periodicity, mode, and manner of destruction of The Documents;
- permitted delegation of the responsibility to authorized officers of the Company;
- Periodical confirmation of compliance; etc.

#### **6. Communication and dissemination of the Policy**

A copy of this policy shall be posted on the internal HR portal of the Company for information of and compliance by all the employees, and the website of the Company.

#### **7. Amendments**

The Director & CEO of the Company / Executive Director is authorized to amend this Policy to be consistent with the prevailing provisions of Acts, rules, guidelines, regulations, and by administrative/ business requirements of the Company. Any clarification needed on the Policy may be referred to Company Secretary.

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**Annexure 1**

**The Documents that shall be preserved permanently by the Company**

<b>S.No.</b>	<b>Nature of Document(s)</b>
1	Incorporation/Registration Documents
2	Certificates obtained from Various Statutory Authorities
3	Licenses and Permits
4	Statutory Registers to be maintained permanently under applicable laws
5	Minutes Books of Board, General, and Committee Meetings
6	Documents relating to shareholders and share transfers
7	Title Deeds of Properties owned by the Company
8	Intellectual Property Documents of the Company
9	Orders, judgments received from any court or adjudicating authority
10	Agreements made by the Company with Stock Exchanges & Depositories
11	Employee retirement and pension records
12	Such other records as may be decided by the Departmental Heads in consultation with the legal department or as may be required under any law from time to time

**Annexure -2**

**Documents that shall be preserved for not less than eight years or such shorter/extended periods as may be required by the applicable law**

<b>S.No.</b>	<b>Nature of Document(s)</b>
1	Books of Accounts and Financial Statements
2	Tax Records
3	Statutory Registers, Forms, and Returns under applicable laws
4	Material Contracts
5	Press releases and public filings
6	Such other records as may be decided by the Departmental Heads in consultation with the legal department or as may be required under any law from time to time