

# **Novartis India Limited**

## **Policy for Preservation of Documents**

### **Introduction**

The Company has formulated Policy for Preservation of Documents (the “Policy”) to comply with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”). The Regulations seek to govern the listing obligations and disclosure requirements of the listed entities.

### **Purpose**

The Policy aims to establish the framework needed for effective maintenance of the documents of the Company and set principles to be followed for preservation of these documents. The Policy is applicable with effect from 1<sup>st</sup> December, 2015.

Maintenance and preservation of the documents is responsibility of all associates of the Company thereby ensuring its continuous and timely availability.

### **Scope**

This policy shall currently apply to all the registers, records, documents that are mandatorily required to be maintained and preserved under the applicable provisions of the Act and Regulations, to the extent applicable to the Company, for the time being in force.

### **Definitions**

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

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

“Board of Directors” or “Board” means the Board of Directors of Novartis India Limited.

“Company” means Novartis India Limited.

“Documents” means recording of information in any form whether physical or electronic including data in computer systems, created or retrieved and maintained by an organization or person in the transaction of business or the conduct of affairs of the Company and kept as evidence of such activity.

“Maintenance” means keeping Documents, either physically or in electronic form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

### **Maintenance**

The responsibility of maintaining the records would be with the concerned departments within the Company.

- Physical records
  - a) Each of the departments is responsible for keeping track of the location and contents of all physical records for which they are responsible. The respective departments will ensure that physical records are kept in good condition and stored safely in an orderly manner. They will also ensure that no unauthorized person gets access to the records and ensure confidentiality of the records.
  - b) Records and Registers relating to Members, shares and other securities of the Company, including Members’ Register, shall be maintained by the Company’s Registrars and Transfer Agents appointed by the Company.
- Electronic records

Each of the department is responsible for keeping track of all the electronic records for which they are responsible. The respective departments will ensure that electronic records are stored safely on computers and backed up on servers or external hard drives or in any other appropriate manner for easy retrieval. They will also ensure that no unauthorized person gets access to the records and ensure confidentiality of the records.

## **Preservation of Documents**

The preservation of Documents shall be done in the following manner:

- Documents which are to be preserved permanently as per the governing laws shall be maintained and preserved till life time of the Company.
- Documents which are required to be mandatorily preserved for a stipulated period of time under governing laws shall be maintained and preserved for at least stipulated time period.
- Documents in respect of which no time line is stipulated should be maintained and preserved for minimum period of eight years.

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This policy was amended; and was approved by the Board of Directors on July 27, 2022.