

# VEEDA CLINICAL RESEARCH LIMITED

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## ARCHIVAL POLICY

### **1. BACKGROUND**

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) refers to an archival policy as per which, all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations shall be hosted on the website of Veeda Clinical Research Limited (the “Company”) for a minimum period of five years and thereafter as per the archival policy of the Company, which will be disclosed on its website i.e. [www.veedacr.com](http://www.veedacr.com)

The Board of Directors (“Board”) had adopted the Policy at its meeting held on 22<sup>nd</sup> September, 2021.

Reference to statutory provisions or regulations shall be construed as meaning and including references to any amendment or re-enactment and any amendments to any statutory provisions or regulations or clarifications applicable to the Policy shall automatically be deemed to be included in the Policy, without any further amendment of the Policy by the Board or relevant committee of the Board. The Board may amend this Policy from time to time.

### **2. SCOPE AND APPLICABILITY**

The Policy covers all relevant Documents and Records generated during the course of operations of the Company.

The policy will be applicable to the Company and its subsidiaries.

The concerned departmental head will be responsible for the maintenance, preservation and destruction of Documents and Records pertaining to the respective Department.

### **3. REGULATORY FRAMEWORK**

Regulation 9 of the Listing Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board, classifying the documents in at-least two categories, which are as follows:

- A. Documents’ preservation of which shall be permanent in nature; and
- B. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses A and B above in electronic mode.

Regulation 30(1) of the Listing Regulations requires every listed entity to make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material.

Regulation 30(8) Listing Regulations requires listed entities to disclose on its website all such events or information which has been disclosed to stock exchange(s) under Listing Regulations, 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. OBJECTIVE OF THE POLICY

The objective of this policy is to determine the period for maintenance, preservation and disposal of physical and electronic Documents and Records of the Company. Pursuant to the Regulation 30 of the Listing Regulations, the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 5 (five) years from the date of its publication (hereinafter referred as “Mandatory Hosting Period”) and thereafter, as per this Policy.

#### 5. DEFINITIONS

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

“**Applicable laws**” means securities laws defined under Regulation 30(8) of the Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means Veeda Clinical Research Limited.

“**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.

“**Company Secretary and Compliance Officer**” means the company secretary and compliance officer appointed by the Board.

“**Document/s**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

“**Effective Date**” means the date on which such Policy shall become effective. i.e. the date of adoption of the policy by the board.

“**Managing Director**” means the managing director appointed by the Board and the shareholders of the Company.

“**Policy**” means this policy on archival of the disclosures made for on the website for information and events communicated to stock exchanges formulated by the Company.

“**Listing Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations Page 4 of 6 and Disclosure Requirements) Regulations, 2015 together with the circulars issued there under, including any statutory modifications or re-enactments thereof for the time being in force.

“**Material Events**” means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity’s website.

## **6. ARCHIVAL PROCESS**

- i. The information on Material Events shall be displayed on the website of the Company for Mandatory Hosting Period. 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 Archival 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.
- ii. 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.
- iii. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.
- iv. This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.
- v. Adoption or amendment of this policy shall be communicated to the stock exchange(s) where the Company’s equity shares are listed. This policy shall also be disclosed on the website of the Company.
- vi. 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.

## **7. MODES OF PRESERVATION**

- A. The Documents may be preserved either in physical form or electronic form.
- B. The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- C. The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- D. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
- E. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

## **8. DISPOSAL OF DOCUMENTS AND RECORDS**

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways without the prior written approval of any one of the key managerial personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- A. Recycle non-confidential paper records;
- B. Shred or otherwise render unreadable confidential paper records; or
- C. Delete or destroy electronically stored data.

## **9. REVIEW & AMENDMENT**

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.

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.

## **10. INTERPRETATION**

In case of any conflict between the provisions of this Policy and of the statutory provisions, the statutory provisions shall prevail over this Policy. Any subsequent amendment/ modification in the statutory provisions shall automatically apply to this Policy.

## **11. COMPLIANCE**

All employees of the Company are required to comply with the provisions of this Policy and the guidance manual. Failure to comply by any employee of the Company with this Policy and the guidance may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the compliance officer of the Company, who is in charge of administering, enforcing and updating this Policy.

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