

# BLUE JET HEALTHCARE LIMITED

## POLICY FOR PRESERVATION OF DOCUMENTS

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### 1. PREAMBLE

The Securities and Exchange Board of India (“SEBI”) has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”).

Regulation 9 of the SEBI LODR Regulations requires the Board of Directors of a listed entity to frame a Policy for Preservation of Documents (“Policy”) classifying them into two categories:

- a) Documents whose preservation shall be permanent in nature; and
- b) Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Blue Jet Healthcare Limited (“the Company”) has adopted this Policy for Preservation of Documents.

### 2. APPLICABILITY AND MODES OF PRESERVATION

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

### 3. DEFINITIONS

- a) “Act” means the Companies Act, 2013.
- b) “Applicable Law” means any law, including the rules, circulars, guidelines or regulations issued by the SEBI, Ministry of Corporate Affairs, the Institute of Company Secretaries of India and other professional bodies, under which the preservation of documents has been prescribed.
- c) “Board” means the Board of the Directors of the Company.
- d) “Books of Accounts” includes records maintained in respect of –
  - i) all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place;
  - ii) All sales and purchases of goods and services by the Company;
  - iii) The assets and liabilities of the Company; and
  - iv) The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.

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- e) **“Company”** means Blue Jet Healthcare Limited.
- f) **“Documents”** refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form, and includes without limitation documents such as emails or messages.
- g) **“Electronic Form”** refers to data stored on any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- h) **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- i) **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- j) **“SEBI LODR Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

## 4. ROLES & RESPONSIBILITIES

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of Documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

## 5. AUTHENTICITY

Where a Document is being maintained both in physical form and Electronic Form, the authenticity with reference to the physical form should be considered for every purpose.

## 6. DESTRUCTION OF DOCUMENTS

The documents specified in Annexure A which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads. Any deviation will be approved by the Chief Financial Officer.

## 7. DISSEMINATION OF THE POLICY

The approved Policy shall be uploaded on the Company's website i.e. [www.bluejethealthcare.com](http://www.bluejethealthcare.com)

## 8. COMPLIANCE

The employees of the Company shall strictly comply with this Policy. Each Functional/ Departmental head of the Company shall lay down process for maintenance of

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Documents pertaining to the respective Function/ Department in compliance with this Policy. Failure to comply with this Policy may result in disciplinary action.

## **9. GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

## **10. REVIEW OF POLICY**

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Managing Director and Chief Financial Officer or by the Board.

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# BLUE JET HEALTHCARE LIMITED

## ANNEXURE A

Records as per Companies Act, 2013		
Sr. No.	Record Type	Preservation Period
1.	Memorandum and Articles of Association	Permanent
2.	Certificate of Incorporation	Permanent
3.	Minutes of Board and Committee Meetings	Permanent
4.	Minutes of Shareholders' Meetings	Permanent
5.	Register and Index of Members	Permanent
6.	Resolutions passed by circulation	8 Financial Years
7.	Listing Agreement executed with the stock exchanges	Permanent
8.	Attendance Register – Board and Committee Meetings	8 Financial Years
9.	Register of investments in securities not held in the name of the Company	Permanent
10.	Register of renewed and duplicate certificates	Permanent
11.	Register of contracts in which Directors are interested	Permanent
12.	Register of Directors, Managing Director, Manager and Secretary	Permanent
13.	Register of Directors' Shareholding	Permanent
14.	Register of Inter-corporate loans and investments	Permanent
15.	Register of transfer of shares	Permanent
16.	Register of Transmission of shares	Permanent

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17.	Forms filed with Registrar of Companies (ROC)	Permanent
18.	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
19.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
20.	Annual Returns	8 Financial Years
21.	Correspondence with shareholders	8 Financial Years
22.	Disclosures under SEBI – Substantial acquisition of shares and Takeovers, Regulations	8 Financial Years
23.	Disclosures under SEBI – Prohibition of Insider Trading Regulations	8 Financial Years
26.	Postal Ballot forms	8 Financial Years
27.	Scrutinizer’s Reports on voting at General Meetings/ PostalBallot	8 Financial Years
28.	Newspaper cuttings of notices of Board Meeting and Financial Results	8 Financial Years
29.	Investor meet presentations	8 Financial years
30.	Insurance Records	8 Years from lapse of policy/ settlement of claim
31.	Contacts/ Agreements/ Purchase orders	10 years from date of termination of contract or closure of issue, if any
32.	SEBI & Stock Exchange records	Permanent
33.	Concurrent Audit report, Disclosure in Newspaper, Auditors report, Correspondence with statutory audit	8 Financial Years following the relevant financial year
34.	Various Certificates, licenses, approvals obtained from Statutory authorities	Permanent
35.	Legal records	10 years from closure of matter

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<b>Accounts and Finance Records</b>		
<b>Sr. No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
1.	Annual Audited and Financial Statements	Permanent
2.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3.	Investment Records	8 Financial Years from the date of redemption
4.	Engagement letters from Auditors	8 Financial Years

<b>Tax Records</b>		
<b>Sr. No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
1.	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return.	8 Financial Years
2.	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 Financial Years

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