

CIAN HEALTHCARE LIMITED

REGISTERED OFFICE: MILKAT NO.3339, BLOCK NO.1, FROM SOUTH SIDE, C.S. NO. 227/2+3A, HARPALE PARK, OPP. BERGER PAINT, PHURSUNGI PUNE MH 412308 IN
Website: www.cian.co , Phone No. + 91-20-41471234

POLICY FOR PRESERVATION OF DOCUMENTS

&

ARCHIVAL OF DOCUMENTS

[PERTAINING TO EVENTS/INFORMATION DISCLOSED TO STOCK EXCHANGE] IN WEBSITE

[Framed under Regulation 9 & 30 (8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

I.POLICY FOR PRESERVATION OF DOCUMENTS

[Framed under Regulation 9 of Chapter III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

1. DEFINITIONS

In this Policy, unless the context otherwise requires:-

“Act” Means Companies Act, 2013.

“Company” means Cian Healthcare Limited. Or Cian.

“Board of Director” Board of Director of Cian HealthCare Limited.

“SEBI” means The Securities and Exchange Board of India.

“Rules” means rules made under the Companies Act, 2013

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

“SS-I” means Secretarial Standards – I for the Board Meeting as notified by the ICSI.

“SS-II” means Secretarial Standards – II for the General Meeting as notified by the ICSI.

Words and expressions used in this Policy but not defined shall have the meaning as given in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Any subsequent modification and/or amendments brought about by SEBI in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 shall automatically apply to this Policy.

2. PURPOSE AND SCOPE



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The purpose of this document is to present a high level policy statement for Cian Healthcare Limited (“the Company”) regarding preservation of its documents in accordance with all the statutory and regulatory provisions applicable to the Company including the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

This policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, and how and when those documents should be disposed of, if no longer needed pursuant to the applicable statutory and regulatory provisions. This policy has been adopted and approved by the Board of Directors at its meeting held on 09/01/2019 and shall become applicable.

3. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

The Board of Directors has classified the documents to be retained and preserved in two categories which are mentioned below:

I) Documents whose preservation shall be permanent in nature – as prescribed under Companies Act, 2013 & Rules made there under.

Notwithstanding anything contained herein the Act, along with their rules, SS-1 and SS-2 the following documents/records maintained under the Act, Rules and Regulations shall be preserved permanently and hosted on the website of the Company:-

- a) Financial Statements, duly signed Annual Reports.
- b) Minutes of all the General Meetings.
- c) Disclosures made under the SEBI (Prohibition of Insider Trading) Regulations, 2015 to the Stock Exchange from time to time.
- d) Memorandum and Article of Association of the Company as may be amended from time to time.
- e) Shareholder and Joint Venture Agreement.
- f) Letter of Offer related to public issue, right issue, further issue, buyback offer etc.
- g) Agreement with Share Transfer Agent, Depository etc.
- h) Any others, if Board of Directors may deems think fit.

II) Documents with preservation period of not less than 8 years after completion of relevant transactions- as prescribed under Companies Act, 2013 & Rules made there under.

- a) Notice of the Board Meetings given to Stock Exchange for considering matters relating to pre-intimations required to be submitted to the Stock Exchange.
- b) Date for the Book Closure and Record dates for various purposes as may be decided by the Company from time to time.
- c) Quarterly and Half Yearly and Annual Financial Results of the Company.



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- d) Quarterly Shareholding Pattern including details for pledge and any changes therein.
- e) Results of e-Voting, General Meetings, Postal Ballot etc.
- f) List of Unpaid Dividend to the Shareholders.
- g) Change in the Constitution of the Board of Directors, KMP, Compliance Officer, Auditor, Secretarial Auditor, Share Transfer Agent.
- h) Agreement with the Share Transfer Agent, Depositories.
- i) Any Price Sensitive Information's given or provided to the Stock Exchange under Regulation 30 of the SEBI (LODR) Regulations, 2015.
- j) Recommendation and Payment of dividend to the shareholders.
- k) Details of the Compliants received and resolved by the Company.
- l) Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis.
- m) Copy of order issued by the SEBI of Stock Exchange relating to securities listed with the Stock Exchange.
- n) Disclosure made under Companies Act, 2013 in form MBP-1.
- o) Registers maintained under Companies Act.

The above said documents shall be preserved by the company for a period atleast 8 years. The Board of Directors may decide the preservation period for any particular documents.

Income Tax, Sales Tax, Central Excise and Service Tax related documents, i.e., Assessment Orders, Tax Bills, Receipts, Statements, Returns, Notices, etc shall be preserved for a period of 8 years as required under the applicable laws.

Details pertaining to the list of documents to be preserved under the abovementioned applicable laws and regulations have been provided to the respective departments to ensure safe record keeping and compliance of the applicable laws and regulations.

4. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

The Company Secretary and in absence thereof the Key Managerial Personal appointed by the Board of Directors of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

5. AUTHORISED FOR MONITORING THE POLICY

The Company Secretary and in absence thereof the Key Managerial Personal appointed by the Board of Directors of the Company are responsible for monitoring the policy. The authorized person shall inform its Board of Directors about the monitoring of the Policy.

The authorized person shall take necessary steps to discharge his duty.

6. PRESERVATION PRINCIPLES



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It is only through preservation that continued availability and access to items in the collections can be maintained. The following principles shall be kept in mind.

- Where possible, documents are preserved in their original format, respecting the physical integrity and authenticity of the original documents.
- Active conservation is employed when appropriate to prevent further deterioration or damage to an item, or to enable access to be given.
- Appropriate conservation measures will take into account the needs, value, significance, and usage of the item in question.
- Surrogates shall be created where appropriate to protect the original, and to allow wider access to the content. Surrogates shall not replace the original, which will still need preservation.
- All staff are made aware of the paramount importance of preservation, and are trained on safe handling of documents.

7. SECURITY OF DOCUMENTS

The Board shall ensure that all the documents shall keep in safe place in the Company premises. The Board may authorize person for the security of documents, who shall be responsible for safe custody of documents.

8. PERIODICAL REVIEW OF THE POLICY BY THE BOARD OF DIRECTORS

This policy shall be reviewed periodically by the Board and amendments effected subject to approval of the Board if and when practical difficulties are encountered. The Board may also review this policy on document retention to comply with any local, state, and central legislation that may be promulgated from time to time.

9. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, then disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. Such documents shall be preserved until the completion of the judicial proceedings.

10. DISPOSAL OF DOCUMENTS AND ITS REGISTER.

Disposal of documents after said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized person in method prescribed by Board of Directors. Before disposing a soft copy shall be taken for the record. The company shall maintain a register in the form set out in the *Annexure* enclosed



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hereto wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Company Secretary or such other persons as may be authorized by the Board for the purpose.

11. POLICY REVIEW

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

In case of any subsequent changes in the Companies Act, 2013 or Regulations which makes any of the provisions in the Policy inconsistent with the Regulations, the provisions of the Act or Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

This Policy shall be reviewed by the Board of Directors as and when any changes are to be incorporated in the Policy due to change in regulations or as may be felt appropriate by the Board. Any changes or modification on the Policy would be approved by the Board of Directors.

12. POLICY SEVERABLE

This Policy along with Annexure constitutes the entire document in relation to its subject matter. In the event that any term, condition or provision of this Policy is being held to be in violation of any applicable law, statute or regulation, the same shall be severable from the rest of this Policy and shall be of no force and effect, and this Policy shall remain in full force and effect as if such term, condition or provision had not originally been contained in this Policy.



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II. ARCHIVAL OF DOCUMENTS [PERTAINING TO EVENTS OR INFORMATION DISCLOSED TO STOCK EXCHANGE] IN WEBSITE

[Framed under Regulation 30 of Chapter IV of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

- ∞ The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30 of Chapter IV of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and such disclosures shall be hosted on the website of the Company for a minimum period of five years.
- ∞ The Company shall disseminate the information specified in Regulation 46 of Chapter IV of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 on its website.

**FOR AND ON BEHALF OF
CIAN HEALTHCARE LIMITED**


**(SURAJ SHRINIWAS ZANWAR)
MANAGING DIRECTOR
DIN: 01304850**



**Date: 09/01/2019
Place: Pune**

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Annexure

REGISTER OF DOCUMENTS DESTROYED

Sr. No.	Section/Rules in Companies Act, 2013	Description of document destroyed	Time upto which document was preserved	Date of Destruction	Mode of destruction	Initials of Company Secretary or other authorized person

