



BIO MEDICA LABORATORIES LIMITED

(FORMERLY BIO MEDICA LABORATORIES PRIVATE LIMITED)

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

BIO MEDICA LABORATORIES LIMITED

Bio Medica Laboratories Limited

Director

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1. INTRODUCTION:

Pursuant to the provisions of Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements), Regulation 2015 ('SEBI Listing Regulations'), the Board of Directors of the Company have adopted a **Policy for Preservation of Documents and Archival Policy**.

2. PREAMBLE

The Board of Directors (the 'Board') of **BIO MEDICA LABORATORIES LIMITED** (the 'Company') has adopted the following policy and procedures for the purpose of preservation of documents and archival of documents on the website of the Company. The Board may review and amend this policy from time to time.

Accordingly, this policy is made and approved by the Board of Directors in its meeting on March 15, 2025 and will be applicable to Company effective from March 5, 2025.

3. OBJECTIVE OF THE POLICY

The Policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business.

The purpose of this Policy is to facilitate

1. Identification, categorization, maintenance and review of documents/records that are to be retained after completion of the relevant transaction in accordance with the applicable laws and regulations;
2. Decide upon the mode of preservation of documents, whether in physical form or in electronic form;
3. Preservation of the confidentiality and security of records; and
4. Systematic and nonselective disposition of records no longer required.

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED/ RETAINED: -

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- C. Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the Annexure.

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5. DEFINITIONS

Unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Code, shall have the meaning assigned to them below:

- i. **"Books of Accounts"** as defined in Section 2(13) of the Act.
- ii. **"Company"** means Bio Medica Laboratories Limited.
- iii. **"Documents"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- iv. **"Maintenance"** means keeping documents, either physically or in Electronic Form
- v. **"Policy"** means this Policy on Preservation of Company Documents and Archival Policy.
- vi. **"SEBI Listing Regulations"** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

6. ROLES & RESPONSIBILITIES: -

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

7. 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 any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

8. WEB ARCHIVAL POLICY:-

The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s) in accordance with Regulation 30 of the SEBI Listing Regulations. Such disclosures shall be retained on the website of the Company for a minimum period of five years.

At the end of the fifth year, the information shall be archived and preserved for a further period of three years

9. PRESERVATION OF DOCUMENTS

The Documents shall be preserved under following three categories:

- (i) Documents whose preservation shall be permanent in nature

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The documents of a **permanent nature** which is given in Annexure 1 shall be maintained and preserved permanently by Bio Medica Laboratories Limited ("the Company") subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

(ii) Documents whose preservation period shall not be less than eight years after completion of the relevant transactions

The documents which is given in Annexure 2 to be maintained and preserved for **not less than eight years** after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

In the event the Company is served with any notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed of. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy. They shall also designate an authorised person who shall ensure compliance of this Policy.

(iii) Documents whose preservation shall be for a minimum period of three years after completion of the event

The documents which are given in Annexure 3 to be maintained and preserved for **not less than three years** after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

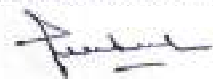
10. DESTRUCTION OF DOCUMENTS

The documents specified in Annexure 2 & Annexure 3 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 manner as specified and approved by the Functional/ Departmental Heads.

11. AMENDMENT TO THE POLICY

The policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and

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amended with due approval from the Board of Directors. However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

For Bio Medica Laboratories Limited

Bio Medica Laboratories Limited



Pradeep Mehta
Director

Name: Pradeep Mehta DIN: 07254802

Managing Director

DIN: 07254802

Date: 05/03/2025

Place: INDORE



"ANNEXURE – 1"**DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE**

Sr. No.	Documents
1.	Property records including purchase and sale deeds, licences, copyrights, patents & trademarks
2.	Certificate of Incorporation
3.	Minutes of Board, Committee and Shareholders' Meetings
4.	Register of Members and other Statutory Records
5.	Personal files of all live employees
6.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

"ANNEXURE – 2"**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF RELEVANT TRANSACTION**

Sr. No.	Documents
1.	Books of account including relevant books and papers and financial statements.
2.	Disclosures/ notices by a director of his interest
3.	Instrument creating a charge or modification
4.	Annual return and copies of all certificates and documents required to be annexed thereto
5.	Registers of Fixed assets
6.	Attendance Register of Board Meetings
7.	Attendance Register of Committee Meetings
8.	Attendance Slips of General Meetings
9.	Register of Deposits
10.	Register of Proxies
11.	Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
12.	Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
13.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

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Pradeep Mehta
Director
DIN:07254802

"ANNEXURE – 3"**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN THREE YEARS
AFTER COMPLETION OF RELEVANT TRANSACTION**

Sr. No.	Documents
1.	Tender Documents
2.	Lease Deeds and Contracts
3.	Legal files
4.	Insurance Records including policies and claims
5.	All e-mail correspondence, internal & external
6.	Proof of sending and delivery of the Notice of Board Meeting and draft Circular Resolution
7.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

Bio Medica Laboratories Limited

**Pradeep Mehta**
Director
DIN:07254802