

BRAWN BIOTECH LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

(Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. PREAMBLE

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 require every listed entity to formulate a policy for preservation of documents.

This Policy provides a framework for systematic identification, maintenance, retention, and disposal of documents maintained by **M/s Brawn Biotech Limited** in compliance with the provisions of applicable laws including the Companies Act, 2013 and SEBI Regulations.

This policy shall apply to all documents maintained by the Company in physical or electronic form including statutory records required under the Companies Act, 2013, SEBI Regulations and other applicable laws.

This policy supersedes the earlier NRC policy issued by the company in April, 2019.

2. OBJECTIVE

The objective of this Policy is to:

- ensure proper maintenance and preservation of documents
 - ensure accessibility of records whenever required
 - comply with statutory and regulatory requirements
 - ensure secure destruction of documents after expiry of retention period
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3. DEFINITIONS

- a) **“Act”** means the Companies Act, 2013 including any statutory modification or re-enactment thereof.
- b) **“Applicable Law”** means any law, rules, regulations, circulars or standards issued by SEBI, Ministry of Corporate Affairs, Stock Exchanges or any statutory authority.
- c) **“Board”** means the Board of Directors of the Company.
- d) **“Company”** means Brawn Biotech Limited.



- e) **“Document(s)”** includes papers, records, files, registers, agreements, minutes, correspondence, forms, returns, books, reports, electronic records and any other information maintained in physical or electronic form.
- f) **“Electronic Record”** means records maintained in electronic form as defined under the Information Technology Act, 2000.
- g) **“Listing Regulations”** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

4. SCOPE

This Policy shall apply to all documents, records, registers, books, papers, files, returns, forms, agreements, minutes, reports, correspondence and other information maintained by the Company, whether created internally or received from external sources, which are required to be preserved under any applicable law or maintained for business, regulatory, statutory or operational purposes.

This Policy shall apply to all documents maintained by the Company in physical form and electronic form. The Policy covers preservation, maintenance, accessibility, and destruction of documents maintained by the Company.

5. CLASSIFICATION OF DOCUMENTS

Documents maintained by the Company shall be classified into the following categories in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

(A) Documents whose preservation shall be permanent in nature.

(B) Documents whose preservation shall be for a period of not less than eight years after completion of the relevant transactions.

Provided that where any applicable law prescribes a specific retention period for any document, the same shall be preserved in accordance with such applicable law.

An indicative list of documents along with their preservation period is provided in Annexure-I of this Policy.

6. MODE OF PRESERVATION

The documents of the Company may be preserved in any of the following forms:

- (a) Physical form
- (b) Electronic form

Documents maintained in electronic form may include records stored in computers, laptops, servers, external storage devices, or any other electronic medium capable of storing and retrieving data.



The Company shall ensure that adequate security and control mechanisms are in place to safeguard the documents and records from loss or destruction, unauthorized alteration or modification, damage or deterioration, unauthorized access.

The Company shall also ensure that the preserved documents remain accessible, retrievable and usable for the period of their preservation as prescribed under this Policy or under any applicable law.

Where documents are maintained in electronic form, appropriate backup systems and data protection measures shall be implemented to ensure continuity and protection of records.

7. RESPONSIBILITY FOR PRESERVATION

The Company Secretary and Compliance Officer of the Company shall be responsible for the overall implementation, administration and monitoring of this Policy. In this regard, the Company Secretary / Compliance Officer shall be responsible for:

- (a) ensuring proper implementation of this Policy across the Company
- (b) monitoring and supervising the preservation and maintenance of documents in accordance with the retention periods specified under this Policy and applicable laws;
- (c) ensuring compliance with the provisions of the Companies Act, 2013, SEBI Regulations and other applicable statutory requirements relating to maintenance and preservation of documents;
- (d) maintaining or supervising the maintenance of the register or records relating to the destruction of documents in accordance with this Policy.

All functional departments of the Company shall be responsible for maintaining and preserving documents pertaining to their respective areas of operations in accordance with this Policy, under the overall supervision of the Company Secretary / Compliance Officer.

8. CUSTODY OF DOCUMENTS

The custody of documents shall vest with the respective department or authorized person responsible for maintaining such documents in the ordinary course of business.

The concerned department or authorized person shall ensure that the documents in their custody are properly maintained, safeguarded, and preserved in accordance with the provisions of this Policy and applicable laws.

Access to such documents shall be restricted to authorized personnel only, and appropriate measures shall be taken to ensure protection of documents against loss, damage, alteration or unauthorized access.

In the event of transfer, resignation, retirement or change in role of an authorized person, all documents, records, and related access credentials under their custody shall be duly handed over to the successor or any other officer designated by the Company. The handover process shall ensure continuity in maintenance and preservation of such documents.



The Company Secretary / Compliance Officer shall have overall supervisory authority to ensure that the custody and transfer of documents are carried out in accordance with this Policy.

9. DESTRUCTION OF DOCUMENTS

Documents may be destroyed only after the expiry of the retention period specified under this Policy or under any applicable law, provided that such destruction is carried out in accordance with the procedures prescribed herein.

No document shall be destroyed if the same is required to be preserved under any applicable law, or if the document is required for any ongoing investigation, litigation, audit, regulatory inquiry, or other legal proceeding.

Destruction of documents shall be carried out only with the approval of the Company Secretary / Compliance Officer or any other officer authorised by the Company, and in a manner that ensures confidentiality and prevents unauthorized access to information.

Documents may be destroyed through any of the following methods, as may be appropriate:

- (a) shredding of physical documents
- (b) pulping or recycling of paper records
- (c) secure deletion of electronic records
- (d) any other method approved by the Company that ensures complete destruction of the document

The Company shall maintain a Register of Documents Destroyed, containing details such as:

- (a) description or name of the document
- (b) retention period applicable to the document
- (c) date of destruction
- (d) mode of destruction
- (e) authorization details and signature of the authorised person

The register shall be maintained under the supervision of the Company Secretary/Compliance Officer.

10. CONVERSION OF DOCUMENT FORM

Documents maintained in physical form may be converted into electronic form for the purpose of efficient storage, easy retrieval, better record management and optimal utilization of physical space.

Such conversion shall be carried out under the supervision of the Company Secretary or any other officer authorised by the Company, ensuring that the process maintains the authenticity, integrity and reliability of the original document.

The electronic records so created shall be stored in a secure manner and shall be capable of being retrieved, reproduced and accessed whenever required.



Where documents are converted into electronic form, the Company shall ensure that:

- (a) the scanned or digitized document is a true and complete reproduction of the original document;
- (b) adequate security and backup systems are in place to safeguard the electronic records;
- (c) access to electronic records is restricted to authorised personnel only;
- (d) the electronic records are maintained in compliance with the Information Technology Act, 2000 and applicable statutory provisions.

The Company may, where considered appropriate, retain the original physical documents even after conversion into electronic form in accordance with the provisions of applicable law.

11. ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the company for a period of 3 years on the advice of the concerned Functional / Department / Group Head.

12. AUTHORITY TO AMEND POLICY

The Board of Directors shall have the authority to amend this Policy from time to time in accordance with applicable laws. Any amendment in the SEBI Regulations or Companies Act shall automatically apply to this Policy.

13. INTERPRETATION

In case of any conflict between the provisions of this Policy and applicable law, the provisions of the applicable law shall prevail.

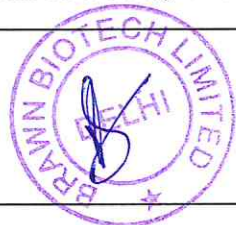


ANNEXURE-I

Indicative List of Documents and Retention Period

A. Documents to be Preserved Permanently

S. No.	Document	Retention Period
1	Memorandum of Association and Articles of Association	Permanent
2	Certificate of Incorporation and statutory certificates	Permanent
3	Register of Members	Permanent
4	Register of Directors and Key Managerial Personnel	Permanent
5	Register of Charges	Permanent
6	Register of Investments, Loans, Guarantees and Securities	Permanent
7	Register of Contracts and Arrangements in which Directors are interested	Permanent
8	Minutes of Board Meetings	Permanent
9	Minutes of Committee Meetings	Permanent
10	Minutes of General Meetings	Permanent
11	Statutory Registers maintained under the Companies Act, 2013	Permanent
12	Share certificate counterfoils and related records	Permanent
13	Licenses, registrations and approvals obtained from statutory authorities	Permanent
14	Orders of Courts, Tribunals and Regulatory Authorities	Permanent



15	Important agreements having long-term impact on the Company	Permanent
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B. Documents to be Preserved for Not Less Than Eight Years

S. No.	Document	Retention Period
1	Annual Returns filed with Registrar of Companies	8 Years
2	Financial Statements and related working papers	8 Years
3	Tax records, returns and related documents	8 Years
4	Register of Debenture Holders (after redemption)	8 Years
5	Register of Charges after satisfaction	8 Years
6	Notices and agenda papers of Board and General Meetings	8 Years
7	Attendance registers of meetings	8 Years
8	Office copies of notices of meetings	8 Years
9	Postal ballot records and related documents	8 Years
10	Scrutinizer reports relating to voting and postal ballot	8 Years
11	Copies of documents filed with Stock Exchanges	8 Years
12	Insider trading compliance records	8 Years
13	Investor grievance records and correspondence	8 Years
14	Correspondence with regulatory authorities	8 Years
15	Internal reports and compliance filings	8 Years

Board Approval Clause

This Policy was approved by the Board of Directors of **Brawn Biotech Limited** at its meeting held on April 09, 2026 and shall be effective from April 09, 2026.

