

Novartis India Limited

Policy for Preservation of Documents

Introduction

The Company has formulated Policy for Preservation of Documents (the “Policy”) to comply with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”). The Regulations seek to govern the listing obligations and disclosure requirements of the listed entities.

Purpose

The Policy aims to establish the framework needed for effective maintenance of the documents of the Company and set principles to be followed for preservation of these documents. The Policy is applicable with effect from 1st December, 2015.

Maintenance and preservation of the documents is responsibility of all associates of the Company thereby ensuring its continuous and timely availability.

Scope

This policy shall currently apply to all the registers, records, documents that are mandatorily required to be maintained and preserved under the applicable provisions of the Act and Regulations, to the extent applicable to the Company, for the time being in force.

Definitions

“Act” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“Regulations” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

“Board of Directors” or “Board” means the Board of Directors of Novartis India Limited.

“Company” means Novartis India Limited.

“Documents” means recording of information in any form whether physical or electronic including data in computer systems, created or retrieved and maintained by an organization or person in the transaction of business or the conduct of affairs of the Company and kept as evidence of such activity.

“Maintenance” means keeping Documents, either physically or in electronic form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

Preservation of Documents

The preservation of Documents shall be done in the following manner:

- Documents which are to be preserved permanently as per the governing laws shall be maintained and preserved till life time of the Company.
- Documents which are required to be mandatorily preserved for a stipulated period of time under governing laws shall be maintained and preserved for at least stipulated time period.
- Documents in respect of which no time line is stipulated should be maintained and preserved for minimum period of eight years.