



Strides Pharma Science Limited

POLICY FOR PRESERVATION OF DOCUMENTS

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(With effect from December 1, 2015)

PREFACE & LEGAL FRAMEWORK

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) has imposed certain obligations and disclosure requirements on all listed companies. One of the common obligations for all listed entities, pursuant to Regulation 9 of the Listing Regulations, being to formulate and put in place a Policy for Preservation of Documents classifying them into two categories:

1. Documents whose preservation shall be permanent in nature; and
2. Documents with preservation period not less than eight years after completion of the relevant transactions.

This Policy for preservation of documents/ records is aligned with the provisions of the Companies (Management and Administration) Rules, 2014.

The Board of Directors of Strides Pharma Science Limited has approved the following policy (“Policy”) of the Company for preservation of documents and records maintained by the Company in physical or electronic form.

PURPOSE OF THE POLICY

The purpose of this Policy is to ensure that all the necessary Documents and records of the Company are adequately protected and preserved as per the relevant statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are destroyed after following the due process for destruction of the same.

This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the Documents and records, which are required to be maintained as per the applicable statutory and regulatory requirements.

1. DEFINITIONS

- 1.1. **“Board of Directors”** or **“Board”** Board of Directors or Board shall mean the Board of Directors of Strides Shasun Limited, as constituted from time to time.
- 1.2. **“Company”** shall mean Strides Pharma Science Limited.
- 1.3. **“Documents”** shall mean all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force and shall include those created and maintained in the electronic form (recognized by sec. 4 of the Information Technology Act, 2000).
- 1.4. **“Litigation Hold”** means a written direction/ instruction from Legal Department to preserve or to stop destruction of documents till further notice on grounds of possibility of future litigation.

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

1.6. **“Regulations”** or **“Listing Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. DOCUMENTS AND THEIR PRESERVATION PERIODS

2.1. Documents to be Preserved Permanently

2.1.1. Under the Companies Act, 2013

- 2.1.1.1. Memorandum and Articles of Association as amended from time to time.
- 2.1.1.2. Certification of Incorporation
- 2.1.1.3. Licenses, Registration Certificates, Permissions and Approvals
- 2.1.1.4. Register of Contracts (under sec. 189 of Companies Act, 2013)
- 2.1.1.5. Register of Directors and Key Managerial Personnel (KMPs) and securities held by them
- 2.1.1.6. Register of Loans and Investments made by the Company
- 2.1.1.7. Register and Index of Members
- 2.1.1.8. Documents relating to intellectual property rights such as patent applications and granted patents
- 2.1.1.9. Minutes of the Board, Committees of the Board, and General Body meetings including meetings conducted through postal ballot
- 2.1.1.10. Resolutions passed by circulation
- 2.1.1.11. Audited Financial Statements
- 2.1.1.12. Documents relating to properties owned by the Company;
- 2.1.1.13. Orders issued by National Company Law Tribunal/ High Courts sanctioning Scheme of Arrangements involving Merger/ Amalgamation/ De-merger or any such Corporate Actions.
- 2.1.1.14. PAS-3 form or such other forms as prevalent, filed with the Registrar of Companies for allotment of securities since incorporation.
- 2.1.1.15. Credit confirmations issued by the Depositories for allotment of securities.

2.1.2. Under the Listing Regulations

- 2.1.2.1. Listing Agreements executed with Stock Exchanges
- 2.1.2.2. Listing/ Trading approval relating to listing of securities
- 2.1.2.3. Offer documents for public issue and private placement of securities filed with the SEBI

2.1.3. Others

- 2.1.3.1. Register of records and documents destroyed.

2.2. Documents to be Preserved for not less than Eight Years after completion of the relevant transaction.

2.2.1. Under the Companies Act, 2013

- 2.2.1.1. Books of Accounts including vouchers and bills
- 2.2.1.2. Register of Charges from the date of satisfaction of respective charge
- 2.2.1.3. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
- 2.2.1.4. Contracts (8 years after expiry), Interim Orders and Pleadings before Courts
- 2.2.1.5. Other Property-related documents
- 2.2.1.6. Register of buy back of Securities from the date of completion of buy-back
- 2.2.1.7. Annual Returns along with Annexures
- 2.2.1.8. Return of declaration in respect of beneficial interest in any share
- 2.2.1.9. Forms and returns filed with RBI/MCA or with any other statutory authority
- 2.2.1.10. Register of Transfer and Transmission of Shares, Debentures or other securities
- 2.2.1.11. Scrutinizer's Report on Postal Ballot and Annual General Meetings
- 2.2.1.12. Documents relating to appointment of Managerial Personnel
- 2.2.1.13. Personnel Documents
- 2.2.1.14. Insurance Policies/Claims under various policies
- 2.2.1.15. Non-Statutory Registers/Documents
- 2.2.1.16. Records related to Court/Arbitration/Judicial/Quasi-Judicial cases
- 2.2.1.17. Register of Debenture Holders
- 2.2.1.18. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

2.2.2. Under Listing Regulations

- 2.2.2.1. All reports filed with stock exchanges from time to time
- 2.2.2.2. All disclosures of various events and press releases filed with the stock exchanges
- 2.2.2.3. Intimations of Board Meetings

2.2.3. Books of Accounts and Tax Records

- 2.2.3.1. Books of accounts and tax records should be retained for at least eight years following the completion of the relevant transactions or assessment year for which the records were last used or as per the requirement of the relevant statute.

2.2.4. Other Documents

- 2.2.4.1. Further, the Company shall disclose on its website all such events or information which has been disclosed to the Stock Exchanges under SEBI Listing Regulations, and such disclosures shall be hosted on the website of the Company for a minimum period of five years.

- 2.2.4.2. In case of any other Documents not specifically covered above, their time for destruction shall be as specified in the relevant law. Employees must refer to the Functional Head for the specific department and Legal Department of the Company for advice on destruction of any such Document.

3. PLACE OF PRESERVATION

- 3.1. The documents listed above shall be preserved at the Corporate Office of the Company under the control of the Company Secretary, unless otherwise required under the applicable law.

4. MAINTENANCE OF RECORDS IN ELECTRONIC FORM:

- 4.1. Pursuant to Section 120 of the Companies Act, 2013 read with rule 27 of the Companies (Management and Administration) Rules, 2014, the documents in electronic form shall be maintained in following manner:
- 4.1.1. the records are maintained in the same formats and in accordance with all other requirements as provided in the Act or the rules made there under;
 - 4.1.2. the information as required under the provisions of the Act or the rules made there under should be adequately recorded for future reference;
 - 4.1.3. the records must be capable of being readable, retrievable and reproducible in printed form;
 - 4.1.4. the records are capable of being dated and signed digitally wherever it is required under the provisions of the Act or the rules made there under;
 - 4.1.5. the records, once dated and signed digitally, shall not be capable of being edited or altered;
 - 4.1.6. the records shall be capable of being updated, according to the provisions of the Act or the rules made there under, and the date of updating shall be capable of being recorded on every updating.
- 4.2. “records” means any register, index, agreement, memorandum, minutes or any other document required by the Act or the rules made there under to be kept by a company

5. PRINCIPLES TO BE FOLLOWED FOR PRESERVATION OF DOCUMENTS

- 5.1. Preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- 5.2. The preserved documents must be accessible at all reasonable times.

- 5.3. Access may be controlled by the concerned authorized person with preservation, so as to ensure integrity of the documents and prohibit unauthorized access.
- 5.4. Sensitive documents containing confidential information or personal information shall be preserved with adequate security measures.
- 5.5. Functional heads of the respective departments shall be primarily responsible for preservation of documents and adherence to this Policy in their respective departments.

6. DESTRUCTION OF DOCUMENTS

- 6.1. After the expiry of the statutory retention period, the preserved Documents may be destroyed in such mode under any instructions approved by the Board. Destruction of Documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both physical and electronic Documents.
- 6.2. Modes of destruction of Documents may include the following:
 - 6.2.1. Shred or otherwise render unreadable confidential paper records:
 - 6.2.2. Delete/ destroy electronically stored data.
- 6.3. A register of the Documents disposed/destroyed to be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/ destruction and the mode of destruction. The entries in the register shall be authenticated by the authorised person.

7. DOCUMENTS ON LITIGATION HOLD

- 7.1. In the event of a 'Litigation Hold' initiated by the Legal Department of the Company in connection with a statutory investigation or dispute before a court or tribunal, the Documents covered by the Hold shall not be destroyed until the hold is lifted by the Legal Department.

8. AMENDMENT TO POLICY

- 8.1. The Board will review this Policy as may be deemed necessary and in accordance with any regulatory amendments.
- 8.2. Company Secretary of the Company is authorised to amend this Policy to give effect to any changes/ amendments notified in the Act and Listing Regulations.
- 8.3. The amended Policy shall be placed before the Board for noting and ratification.
