



ANUH PHARMA LTD.

3-A Shivsagar Estate, North Wing,

Dr. Annie Besant Road, Worli, Mumbai 400 018

Phone: +91 22 6622 7575; **Fax:** +91 22 6622 7600

Email: anuh@sk1932.com; **CIN:** L24230MH1960PLC011586

Web: www.anuhpharma.com

POLICY ON PRESERVATION OF COMPANY DOCUMENTS



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ANUH PHARMA LIMITED POLICY ON PRESERVATION OF COMPANY DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. PREAMBLE

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 of the Listing Regulations is to formulate and put in place a policy for preservation of documents.

2. PURPOSE

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 statutory requirements and to ensure that the records of the Company which are no longer needed are discarded after following the due process for discarding the same.

3. OBJECTIVE

The Major objectives of the policy are:

- a) Identification of Statutory registers and other records of the company which are required to be preserved.
- b) Identification and categorisation of the statutory register and other records to be maintained either for eight years or permanently.
- c) Decided whether the statutory records and documents are to be preserved in physical form or in electronic form.
- d) After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per guidelines of the policy or as decided by the Board of Directors at that time.
- e) Aiding employees of the company in understanding their obligations in retaining and preserving documents and records.



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4. DEFINITIONS

1. “**Act**” shall mean the Companies Act, 2013 including the Rules made thereunder, as amended from time to time.
2. “**Authorised Person**” means any person duly authorized by the Board.
3. “**Board of Directors**” or “**Board**” means the Board of Directors of Company, as constituted from time to time.
4. “**Company**” shall mean “**Anuh Pharma Limited.**”
5. “**Current Documents**” means any documents that still has an ongoing relevance with reference to any ongoing litigation, proceedings, compliant, contract or the like matter.
6. “**Documents**” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
7. “**Electronic Form**” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the company or otherwise the company has control over or access thereto.
8. “**Electronic Record**” means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
9. “**Functional Head**” means respective Management Council member or any other person identified by him/her in writing.
10. “**Maintenance**” means keeping documents, either physically or in Electronic Form.
11. “**Policy**” means Policy on Preservation of Documents, as amended from time to time.



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12. "Preservation" is maintenance of documents, files and documents in usable form and to prevent from being altered, damaged or destroyed.

13. "Regulations" Refers to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications or amendments made thereto.

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Act, Listing Regulations and/or any other SEBI Regulation(s) as amended from time to time.

6. ROLES & RESPONSIBILITY

Annexure A to this policy is a Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The respective Functional Heads of the Company shall be responsible for maintenance and preservation of documents and records and authorised to destroy the records in terms of this policy. The Company may preserve the documents in electronic mode.

7. COVERAGE

This Policy is intended to guide the Company, its officers and employees on maintenance of all Records, their preservation and disposal.

8. MODES OF PRESERVATION

- a) The Documents may be preserved in ***Physical Form or Electronic Form***.
- b) The physical Documents preserved may be converted, whenever required or felt necessary, into Electronic Form and vice versa, with written approval of the respective Functional Head to ensure ease in maintenance of records and efficient utilization of space.
- c) The 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.



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- d) An external agency can be used for the purpose of preserving Documents.
- e) The preserved Documents shall be accessible at all reasonable times. Access may be controlled by the respective Functional Head, so as to ensure integrity of the Documents and prohibit unauthorized access.
- f) All digital and physical records shall be saved/ maintained at the registered office of the Company or such other place in compliance with section 128 of the Companies Act, 2013.

9. PRESERVATION OF RECORD

The preservation of Record 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. This policy sets the standards for managing, storing and preservation of records of the Company broadly classified in the following two categories

- a) Documents whose preservation shall be **PERMANENT IN NATURE (Annexure - I)**;
- b) Documents with preservation **PERIOD OF NOT LESS THAN EIGHT (8) years** after completion of the relevant transactions **(Annexure - II)**.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

10. DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the preservation schedule outlined in **Annexure - I are categorized as permanent in nature and shall be retained indefinitely. Conversely, documents listed under Annexure - II are classified as non-permanent and may be destroyed after the prescribed retention period has elapsed.** The authorized person may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure I & II.

The details of the documents destroyed by the company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at Annexure III.



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The entries in the register shall be authenticated by the authorized person.

The format of the register has to be in accordance with Annexure-III.

11. CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

This will be done after obtaining prior approval of the Authorised person(s)/the Board.

12. CUSTODY OF THE DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tender resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Compact Disc, other storage devices or such other Documents and devices in his possession under the Policy.

13. COMMUNICATION OF THIS POLICY

This Policy shall also be posted on the website of the Company i.e. www.anuhpharma.com.

14. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable with applicable legal requirements.

15. AMENDMENTS

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.

Further, the Company Secretary and Chief Financial Officer are jointly authorized to amend the Policy to give effect to any changes / amendments notified by Ministry of Corporate Affairs or SEBI.



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ANNEXURE - I

INDICATIVE LIST RECORDS TO BE PRESERVED PERMANENTLY

Sr. No.	Record Type
1.	Certificate of Incorporation/ Commencement of Business
2.	Memorandum & Articles of Association
3.	Minutes Books of General Meetings, Board Meetings, Committee Meetings and any other meetings as per Companies Act, 2013
4.	License and Permissions
5.	Register of Members
6.	Index of Members
7.	ROC Forms
8.	Scrutinizers Report
9.	Annual Reports
10.	Board, Committee or any other meeting's Agenda, Notices Notes to Agenda and other related papers
11.	Attendance Registers
12.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
13.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
14.	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
15.	Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks shall also be preserved permanently.
16.	Authorization / licenses obtained from any statutory authority
17.	Policies of the Company framed under various regulations
18.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013
19.	Register of preservation and disposal of records
20.	Register of Power of attorneys, if any
21.	Certificates obtained from various statutory authorities
22.	Original Sale Purchase Agreement
23.	Any other documents as may be applicable under any law, rules or regulation



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ANNEXURE - II

Accounts and Finance:

Sr. No.	Record Type
1.	Annual Audit Reports and Financial Statements
2.	Annual Plans and Budgets
3.	Books of Accounts, Ledgers and Vouchers
4.	Bank Statements
5.	Investment Records
6.	Credit Facility Sanction Letters
7.	Annual Plans and Budgets

Companies Act and SEBI Regulations related Documents:

Sr. No.	Record Type
1.	Annual Returns as per Companies Act, 2013
2.	Register of Deposits as per Companies Act, 2013
3.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
4.	Directors report
5.	All notices in form MBP - 1 received from Directors and KMPs along with any amendment thereto
6.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013.
7.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
8.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
9.	Copy of newspaper advertisement or publications
10.	Compliance Reports received from any statutory authority
11.	Disclosure/Return filed under SEBI LODR Regulations
12.	Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI LODR Regulations.



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Tax Records:

Sr. No.	Record Type
1.	Income Tax Returns filed under Income Tax Act, 1961
2.	Tax Bills, Receipts and Payments
3.	Tax Deducted at Source Records (Assets)
4.	Goods and Service Tax Records
5.	Any other documents as may be applicable under any erstwhile or current law, rules or regulation

Import/Export Documents:

Sr. No.	Record Type
1.	Import/Export Licenses - Related Undertakings, Bonds and Redemption Letters

Legal Case Files, Contracts, Agreements and Papers:

Sr. No.	Record Type
1.	Contracts, Agreements and Related correspondence (including any proposal or expiration of contracts that resulted in the contract and other supportive documentation)
2.	Customer Protection Agreements
3.	Quality Agreement
4.	All show cause notice or any other notice received from any statutory, government departments, Judicial or Quasi-judicial authority etc.
5.	Confidentiality Agreement or any other agreement relating to the products of the Company shall be preserved for a period from the date of its termination
6.	Any other documents as may be applicable under any law, rules or regulation

Insurance Records:

Sr. No.	Record Type
1.	Property Insurance
2.	Insurance Policies, Claim Documents
Miscellaneous	
3.	Other Insurance Policies with yearly validity like motor car policies, personal accident policies, medical benefit policies, etc.
4.	Claims records till the settlement is over and claim money is received
5.	Group Insurance Plans Until plan is amended or terminated



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Personnel and Payroll Records:

Sr. No.	Record Type
1.	Payroll Registers
2.	Bonus, Gratuity and other Statutory Records
3.	Time office Records and Leave Cards
4.	Unclaimed Wages Records
5.	Ex-employees Information Records
6.	Employees Medical Record

Electronic Records:

- All e-mails received from Internal and External Sources may be deleted after 1 year.
- Employees will strive to keep their e-mails related to business issues.
- All e-mails related to business issues should be downloaded to a server.
- Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.

Copies of returns, documents intimations regarding events disclosed to Stock Exchanges under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The disclosures made to the Stock Exchanges shall be hosted on the website of the Company, for minimum period of 5 years in terms of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 and Archival Policy of the Company.

Audio-Visual tape recordings or other electronic mechanism in connection with attendance of directors at Board Meetings/Committee Meetings of the Board through video conferencing facility.

To be preserved at least before the completion of Audit for that particular year in accordance with Rule 3 of Companies (Meetings of Board) Rules, 2014. Thereafter these can be destroyed with the approval of the Board.



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Annexure- III

The format of the register of Documents disposed / destroyed:

Particulars of document along with provision of applicable law	Date and mode of destruction	Initials of the authorised person