

INDOCO REMEDIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

LEGAL FRAMEWORK

The Board of Directors of Indoco Remedies Limited (the 'Company') adopted a 'Policy for Preservation of Documents' under 'Regulation 9' of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

OBJECTIVE

The Corporate records of the Company and its Subsidiaries hereinafter referred to as the 'Company' are important assets of the Company. Corporate Records include but is not limited to Minutes Book, Memorandum and Articles of Association, Contracts, Directors Records, Registers, Legal documents, Accounting documents etc.

Records retention is an important substantive component of many of the laws with which most companies must comply and which helps to be a compliant organisation

Records retention must be in such a manner that it must be retrievable at a later date so that the business dealings can be accurately reviewed as required. Proper retention helps to support accountability and demonstrate compliance.

Refer Annexure A for definition of terms used in the policy.

Most business records have specified retention periods based on legal requirements or internal company policies.

SCOPE

Preservation of Statutory Records

As per the Companies Act, 2013 "Act" and Rules made thereunder, all the registers, forms, returns and other documents as required to be retained should be preserved at such place and for the period as prescribed under the act and rules or any amendments made from time to time and should be kept in the custody of the Company Secretary of the Company or any other person authorized by the Board for the purpose

The two categories for preservation of documents are;

1. **Documents which will be required to be preserved permanently.** The below is an illustrative list of documents required to be maintained permanently by the Company;
 - Register of Members and index of members (Section 88)
 - Minutes book of Board Meeting and General Meeting (Section 118)
 - Register of Directors & Director's shareholding (Section 170)
 - Register of Loans & Investments (Section 186)
 - Register of Contracts & Arrangements (Section 189)
 - Register of Charges (Section 85)
 - Any other document as required by any law/s and/or regulations in force

2. Documents with preservation period of not less than eight years after completion of the relevant transactions. Below is an illustrative list of documents:
 - Annual Return and related annexures (Section 92)
 - Financial statements and related annexures (Section 129)
 - Books of accounts and related books and papers (Section 128)
 - Form MBP 1 for disclosure of interest of Directors (Section 184)
 - Register of Debenture holders and index of debenture-holders (Section 89)
 - Attendance Register of Board Meeting, Committee Meetings and General Meetings (Secretarial Standard 1 and 2)
 - Instruments for creation/modification of charges (Section 84)Any other document as required by any law/s and/or regulations in force.

The above list of documents is illustrative and reference should be drawn from the relevant Acts/ Rules, Legislations/ Guidelines etc. for other documents and their preservations timelines

Company may keep aforesaid documents/records in electronic mode after ensuring proper system of storing the documents in electronic mode which can be easily retrievable as and when required.

Provisions related to inspection and authentication of documents will be governed as per the Act, rules as applicable from time to time.

Registers/Documents can be destroyed after expiration of the period as indicated under the relevant law/rules under authority of the Board or by the Committee as authorised.

Other Records of the Company

Other Records of the Company include but is not limited to Legal Files, Marketing and Sales documents, E-mail, Contracts, Invoices, Tenders etc.

The retention period and other relevant aspects to ensure proper preservation of the aforesaid records of the Company will be as per the guidelines/instructions issued by the relevant functional heads/senior management or as may be decided by the Board from time to time.

POLICY REVIEW

The Policy shall be subject to review of the Board and may be amended as may be deemed necessary and/or in accordance with any regulatory amendments.

Annexure A (Definitions)

- “Record” means a documentary evidence of past events or transactions.
- “Document” as per Section 2 (36) of the Companies Act, 2013 includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form
- “Preservation” means to keep in good order; to prevent from being damaged or destroyed.
- “Register” means documents and records required to be maintained under
 - a. Companies Act, 2013 and Rules thereunder
 - b. SEBI regulations
 - c. Secretarial Standards
 - d. Any other law for the time being in force
- “Electronic record” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000
- Books of accounts: As per Section 2 (13) of the Companies Act, 2013 “books of account” includes records maintained in respect of—
 - (i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
 - (ii) all sales and purchases of goods and services by the company;
 - (iii) the assets and liabilities of the company; and
 - (iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section;