



GLAND PHARMA LIMITED

Policy for Preservation of Documents and Archival of Documents

1. Introduction

The policy for preservation of documents is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “**Listing Regulations**”) and Companies Act, 2013.

Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

2. Purpose of the Policy

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them into at least two categories as follows-

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with a preservation period for not less than eight years after completion of the relevant transactions.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

Accordingly, this policy has been framed, keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.





3. Definitions

- a) "Act" means the Companies Act, 2013
- b) "Applicable Law" means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) and The Institute of Company Secretaries of India (ICSI) under which the preservation of Documents has been prescribed
- c) "Board" means the Board of the Directors of the Company
- d) "Book of Accounts" includes records maintained in respect of –
 - i. all sums of money received and expended by the 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 of the Act in the case of the Company which belongs to any class of companies specified under that section.
- e) "Company" means Gland Pharma Limited
- f) "Documents" refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan 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.
- g) "Electronic Form" means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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 access to it.
- h) "Maintenance" means keeping Documents, either physically or in Electronic Form.
- i) "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- j) "Listing Regulations" means the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The word and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.



4. Policy

4.1 Preservation of documents

(A) Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1. Documents whose preservation shall be permanent in nature:

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is as listed hereunder:

- (a) Annual Reports of the Company.
- (b) Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (c) Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- (d) Registration Certificates
- (e) Licenses & Statutory Approvals
- (f) Statutory Registers and Forms required under applicable laws
- (g) Material Agreements/Contracts
- (h) Orders issued by Courts/Statutory bodies
- (i) Investment Documents/proofs including certificates etc.
- (j) Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

2. Documents with preservation period of not less than eight years after completion of the relevant transactions:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications ,etc. for a period of not less than eight years after completion of the relevant transactions shall



be preserved accordingly. Details of documents with preservation period of not less than eight years after completion of the relevant transactions is listed as hereunder:

- (a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI-LODR, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- (b) Documents/Information submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules thereunder shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is submitted.
- (c) Books of Accounts
- (d) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013
- (e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (f) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
- (g) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (h) Films, Videos, CDs, DVDs, tapes etc.
- (i) Insurance Policies/ Claims under various policies
- (j) 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, 2013 and/or SEBI Regulations.





3. Documents with preservation period other than those mentioned in (2) above:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in 1 & 2 above shall be preserved accordingly.

(B) Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

The Company is required to maintain a functional website and shall disclose on its website all such events or information (“disclosures”) which are required to be disclosed to the stock exchanges under Regulation 30 read with Schedule III of the Listing Regulations.

The disclosures made to the stock exchanges shall be hosted on the Company’s website for a period of five years from the date of initial posting and shall thereafter be archived which shall be retained on the Company’s website for such period as may be decided by the Managing Director from time to time, subject to applicable law.

4.2 Archival of Documents

Documents mentioned in sub clause (A) & (B) of Clause 4.1 above shall be maintained/preserved in the following manner:

- The Documents may be preserved either in physical form or electronic form.
- The officer(s) of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person). This is more particularly as set out in the guidance manual.
- The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity of the Documents and prohibit unauthorised access.



**Documents made available on the website of the company:**

After the expiry of five financial years preceding the current financial year, the information and/or document shall be removed from the main website. The Backup of said information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

5. Destruction of documents

Any of the documents mentioned in sub clause (A) & (B) of clause 4.1 of this policy, which are not required to be maintained and preserved permanently shall be destroyed.

Documents / records are not be kept longer than is necessary and should be disposed of at the right time, as unnecessary retention of records consumes time, space and equipment use. The documents / records referred to in Clause 4.1 (B) above shall be preserved for at least 8 years (or additional period decided by the Company) and may be disposed of after the expiry of the periods of their preservation, after the approval of the Board and in the presence of the Chief Financial Officer and the Company Secretary of the Company.

The Company shall maintain a register of disposal of records in the custody of the Compliance Officer of the Company, wherein the brief particulars of the records disposed of shall be entered.

6. Review of Policy

The Policy shall be subject to review of the Board, and the Board will be authorized to amend it suitably, as may be deemed necessary.

7. Dissemination of the Policy

The approved Policy shall be uploaded on the Company's website. Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

for GLAND PHARMA LIMITED

SRINIVAS SADU
MANAGING DIRECTOR & CEO