



PANACEA BIOTEC LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

Approved by: Board of Directors

Date of approval: 06.11.2015

Effective Date:

December 01, 2015

VERSION: 1.2

(Effective from 03.09.2020)

Summary of Versions

<u>Version</u>	<u>Approved by</u>	<u>Date of Approval</u>	<u>Effective Date</u>
1.1	Board of Directors	06.11.2015	01.12.2015
1.2	Board of Directors	03.09.2020	03.09.2020

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PANACEA BIOTEC LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the “Board”) of Panacea Biotec Limited (the “Company”) has approved the Policy for preservation of Documents (the “Policy”) of the Company maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”). Any future changes in the SEBI LODR Regulations will, ipso facto, apply to this Policy. The Policy has been approved by the Board of Directors in its meeting held on 6th November, 2015.

The said Policy for preservation of Documents of the Company has been updated/modified pursuant to Regulation 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”) after incorporating necessary changes in the said Policy, as per the requirement of SEBI PIT Regulations. Any future changes in the SEBI PIT Regulations will, ipso facto, apply to this Policy.

2. Purpose of the Policy

A Document Preservation Policy identifies documents that need to be maintained and lays down guidelines for how long certain documents should be kept. The Policy brings about economy in office management and efficiency in office performance, improves house-keeping and the ambience of the office.

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 or are of no value are discarded after following the due process for discarding 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.

3. Preservation of Documents

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the SEBI LODR Regulations, the SEBI PIT Regulations and any other law, rules, regulations as may be applicable to the Company from time to time. One year has been added to retention requirements to the records, which are being retained under the Companies Act, 2013.

This policy sets the standards for preservation of documents of the Company, broadly classified in the following categories:

i) Category A- Documents whose preservation shall be permanent in nature:

- a. Certificate of Incorporation and subsequent changes thereto
- b. Memorandum and Articles of Association
- c. Statutory license/approval/sanction/permission/registration
- d. Title to an immovable property or an intellectual property
- e. Minutes Book of Board Meetings and Committees constituted by it
- f. Minutes Book of General Meetings
- g. Register of Members
- h. Any other document, certificates, statutory registers, records that may be required to be preserved permanently as per the Companies Act, 2013 and/or SEBI Regulations or any other law as may be applicable to the Company from time to time

ii) Category B- Documents to be preserved for at least 8 financial years:

- a. Books of accounts
- b. Copies of all Annual Returns as per Companies Act, 2013
- c. Attendance Registers, Notices, Agenda, and other related papers of General Meetings, Board Meetings and various Committee Meetings
- d. Tax Records
- e. Structured digital database containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under SEBI PIT Regulations
- f. Any other documents, certificates, statutory registers which may be required to be maintained and preserved for atleast 8 years as per the Companies Act, 2013 and/or SEBI Regulations or any other law as may be applicable to the Company from time to time.

iii) Category C- General

- a. Besides the documents mentioned in Category 'A' and 'B' above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per applicable Statutory/ Regulatory provisions in this regard.
- b. The documents related to any dispute/legal/arbitration/court cases etc., are to be preserved till final disposal of the case.

4. Mode of maintenance

Records/ documents may be maintained either physically or in electronic form.

5. Responsibility

The Heads of respective Departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

6. Manner of destruction of records

After the expiry of the statutory retention period, the preserved documents may be destroyed. The documents may be destroyed as follows:

- (a) No documents shall be destroyed without being reviewed and recorded. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records and the same must be retained in the office of Functional Head and Administration Head for records after the disposal of the records.
- (b) Physical Records shall be disposed off by controlled burning / shredding in shredder under the supervision of Functional Head and Administration Head.
- (c) Electronic data preserved on servers and hard drives shall be deleted and overwritten. Electronic data contained on all other media shall be destroyed by the physical destruction of that media.

7. Administration

- (a) No officer, director or employee of the Company shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case.
- (b) The documents related to any dispute/legal/arbitration/court cases etc., are to be preserved till final disposal of the case and must be disposed only after getting the clearance from the Legal Department.
- (c) Wherever the period of preservation recommended and the period of preservation mentioned in other statutes is conflicting, the higher period shall be considered for preservation.
- (d) Primarily the responsibility for preservation of records shall rest with respective Functional Heads unless otherwise specified exclusively and such Functional Head shall be the clarifying authority in case of any point of interpretation.

8. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, in consistence with the applicable provisions of any law for the time being in force and the decision of the Board in this respect shall be final and binding.

**Approved by
For and on behalf of Board**

Sd/-

**Mr. Soshil Kumar Jain
Chairman**

Place: New Delhi

Date: 03.09.2020