

POLICY FOR ARCHIVAL OF DOCUMENTS

TITLE:

This Policy shall be called 'Policy for Archival of documents'.

COMMENCEMENT:

This Policy shall come into effect from 1st November, 2020.

OBJECTIVE:

- (a) This Policy is framed in accordance with the requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (including any amendments thereof) to be effective from 27th January 2020 and is intended to ensure upkeep and maintenance of documents/disclosures as per this policy.
- (b) The Company is required to disclose the policy on its website and a web link thereto shall be provided in the Annual Report

DEFINITIONS:

- (a) "Board" means the Board of Directors **Suven Pharmaceuticals Limited**.
- (b) "Company" means **Suven Pharmaceuticals Limited**.
- (c) "Policy" means this Policy, as amended from time to time.

POLICY:

- (a) All documents whose preservation is **permanent** in nature under respective laws applicable to the Company for the time being in force shall be preserved and maintained permanently in a good condition and should be able to be retrieved when needed.
- (b) All documents whose preservation is **for a specified period** as prescribed under respective laws/regulations/standards of various govt. bodies / statutory authorities/ institutes etc., shall be preserved and maintained for such period(s) in a good condition and should be able to be retrieved when needed.

- (c) All documents whose **preservation period is specified under the respective agreements/ deeds/ MOU(s)/ CDAs etc.** with the parties/govt. departments/agencies (both govt. and private) shall be maintained as per the contractual obligations stipulated therein.
- (d) **All disclosures hosted on website of the Company** whose preservation is for a specified period as prescribed under respective laws/regulations of various government department/agencies, stock exchanges and other statutory authorities or under contractual obligations, if any, shall be preserved and maintained for such period(s) on the website.
- (e) **All other documents and/or disclosures** whose preservation if required, shall be maintained in good condition for such periods as may be specified by the management from time to time.

The list of the documents/records to be preserved is provided as annexure A.

The documents at (b), (c) & (e) above may be destroyed after expiry period in the presence of two company officials under specific authorization in writing from the Chairman of the Company and this matter shall be placed in the next meeting of Board of Directors of the Company for noting purpose. Details of documents destroyed shall be entered in the Register kept for this purpose.

AMENDMENTS:

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. The Chairman & CEO or Board of Directors 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 in conformity with the applicable laws in force.

INTERPRETATION:

Any words used in this policy but not defined herein shall have the same meaning ascribed to it in the Companies Act, 2013 or Rules made thereunder, SEBI Act or Rules and Regulations made thereunder, Listing Agreement or any other relevant legislation / law applicable to the Company.

Annexure A

Records as per Companies Act, 2013		
Sr. No.	Record Type	Preservation Period
1.	Memorandum and Articles of Association	Permanent
2.	Certificate of Incorporation	Permanent
3.	Minutes of Board and Committee Meetings	Permanent
4.	Minutes of Shareholders' Meetings	Permanent
5.	Register of investments in securities not held in the name of the Company	Permanent
6.	Register of contracts in which Directors are interested	Permanent
7.	Register of Inter-corporate loans and investments	Permanent
8.	Register of Charges	Permanent
9.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
10.	Attendance Register – Board and Committee Meetings	8 Financial Years
11.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
12.	Annual Returns	8 Financial Years

Accounts, Finance, Tax Records		
Sr. No.	Record Type	Preservation Period
1.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
2.	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return.	8 Financial Years
3.	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 Financial Years