

# **POLICY FOR PRESERVATION OF DOCUMENTS**

**Reviewed on and Effective May 28, 2022**

## PREFACE & LEGAL FRAMEWORK

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) has imposed certain obligations and disclosure requirements on all listed companies. One of the common obligations for all listed entities, pursuant to Regulation 9 of the Listing Regulations, is to formulate and put in place a Policy for Preservation of Documents classifying them into two categories:

1. Documents whose preservation shall be permanent in nature; and
2. Documents to be preserved for not less than eight years after completion of the relevant transactions.

The Board of Directors of Vineet Laboratories Limited has approved the following policy (“Policy”) of the Company for preservation of documents and records maintained by the Company in physical or electronic form.

## PURPOSE OF THE POLICY

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 relevant statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are destroyed after following the due process for destruction of 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.

## DEFINITIONS

1. **“Board of Directors”** or **“Board”** Board of Directors or Board shall mean the Board of Directors of Vineet Laboratories Limited, as constituted from time to time.
2. **“Company”** shall mean Vineet Laboratories Limited.
3. **“Documents”** shall mean all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force and shall include those created and maintained in the electronic form (recognized by sec. 4 of the Information Technology Act, 2000).

4. “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.
5. “**Regulations**” or “**Listing Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## **DOCUMENTS AND THEIR PRESERVATION PERIODS**

### **I. Documents to be Preserved Permanently**

#### **A. Under the Companies Act, 2013**

1. Memorandum and Articles of Association as amended from time to time
2. Certification of Incorporation
3. Licenses, Registration Certificates, Permissions and Approvals
4. Register of Contracts (under sec. 189 of Companies Act, 2013)
5. Register of Directors and Key Managerial Personnel (KMPs) and securities held by them
6. Register of Loans and Investments made by the Company
7. Register and Index of Members
8. Documents relating to intellectual property rights such as patent applications and granted patents
9. Minutes of the Board, Committees of the Board, and General Body meetings including meetings conducted through postal ballot
10. Resolutions passed by circulation
11. Audited Financial Statements
12. Documents relating to properties owned by the Company

#### **B. Under the Listing Regulations**

1. Listing Agreements executed with stock exchanges
2. Trading approval relating to listing of securities
3. Offer documents for public issue and private placement of securities filed with the SEBI

#### **C. Others**

Register of records and documents destroyed

### **II. Documents to be Preserved for not less than 8 years from the date of its event**

#### **A. Under the Companies Act, 2013**

1. Books of Accounts including vouchers and bills
2. Register of Charges from the date of satisfaction of respective charge
3. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
4. Contracts (8 years after expiry), Interim Orders and Pleadings before Courts
5. Other Property-related documents
6. Register of buy back of Securities from the date of completion of buy-back
7. Annual Returns along with Annexures
8. Return of declaration in respect of beneficial interest in any share
9. Forms and returns filed with RBI/MCA or with any other statutory authority
10. Register of Transfer and Transmission of Shares, Debentures or other securities
11. Scrutinizer's Report on Postal Ballot and Annual General Meetings
12. Documents relating to appointment of Managerial Personnel
13. Personnel Documents
14. Insurance Policies/Claims under various policies
15. Non-Statutory Registers/Documents
16. Records related to Court/Arbitration/Judicial/Quasi-Judicial cases
17. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

**B. Under Listing Regulations**

1. All reports filed with stock exchanges from time to time
2. Events or information which has been disclosed to stock exchange(s) shall be hosted on the website of the Company for a minimum period of five years.
3. All disclosures of various events and press releases filed with the stock exchanges
4. Intimations of Board Meetings

**C. Books of Accounts and Tax Records**

Books of accounts and tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used or as per the requirement of the relevant statute.

**D. Other Documents**

In case of any other Documents not specifically covered above, their time for destruction shall be as specified in the relevant law. Employees must refer to the Legal Department of the Company for advice on destruction of any such Document.

## **DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved Documents may be destroyed in such mode under any instructions approved by the Board. Destruction of Documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both physical and electronic Documents. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the authorised person.

## **AMENDMENT TO POLICY**

The Board may, subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this Policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

## **COMPANY'S WEBSITE**

As per Regulation 30(8) of the Listing Regulations, the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the Regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years.

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