

EFFECTIVE DATE:

The Policy shall come into effect on: [●]

DATE OF LAST AMENDMENT:

The Policy was last amended on: [●]

DRAFT

POLICY FOR PRESERVATION OF DOCUMENTS

INTRODUCTION:

This policy is formulated in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulations**”) to preserve documents maintained by the company either in physical mode or electronic mode.

The objective of this policy is to ensure that all the statutory documents are preserved in compliance with the regulations and as per the policy and to ensure that the records no longer needed or are of no value be discarded after following the due process for discarding the same.

Thus, the major objectives of the policy are:

- a) identification of documents which are required to be preserved;
- b) identification of documents whose preservation shall be permanent in nature;
- c) identification of documents which are required to be preserved for period of not less than eight years after completion of the relevant transactions;
- d) identification of documents which are required to be preserved temporarily;
- e) Aiding employees of the company in understanding their obligations in retaining and preserving the documents and records.

DEFINITIONS:

- a) “**Act**” means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.
- b) “**Board of Directors**” shall mean the Board of Directors of the Company.
- c) “**Books of Accounts**” as defined in Section 2(13) of the Act.
- d) “**Company**” means Symbiotec Pharmed Limited.

- e) **“Current”** means running matter or whatever is at present in course of passage.
- f) **“LODR Regulations”** means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.
- g) **“SEBI”** means the Securities and Exchange Board of India.
- 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) **“Policy”** means Policy on preservation of documents.

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the Companies Act, 2013, SEBI (LODR) Regulations, 2015 or any other applicable law or regulation to the extent applicable to the Company.

GUIDELINES:

Pursuant to the Regulation 9 of SEBI LODR Regulations the company has classified the preservation of documents to be done in the following manner:

- a) documents that’s needs to be preserved and retained permanently;
- b) documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI LODR Regulations;
- c) documents that need to be preserved and retained for such period as prescribed under any statute or regulations as applicable to the company;
- d) where there is no such requirements as applicable law then for such period as the document pertains to a matter which is “Current”.

An indicative list of documents according to the time-frame of their preservation is provided in **Annexure-1**.

MODES OF PRESERVATION:

The Documents may be preserved in:

- a) Physical form, or in
- b) Electronic Form

The officer(s) of the company required to preserve the document shall be an authorised person who is generally expected to observe the compliance of requirements of Applicable Law.

The preservation of Documents should be such as to ensure that there is no tampering, alteration, or destruction. Nothing shall be done 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 authorized person with preservation, so as to ensure integrity of the documents and to prohibit unauthorized access.

DESTRUCTION OF DOCUMENTS:

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant, for short-term use only or no longer required to be preserved. This applies to both Physical and Electronic Documents. The documents of the company which are no longer required as per the time prescribed under Annexure A may be destroyed.

The details of the documents destroyed by the company shall be recorded in the register for disposal of records to be kept by the employees who are disposing the document with permission of concerned authorised person in the format prescribed in **Annexure-2**.

LIMITATION AND AMENDMENT:

In the event of any conflict between the provisions of this Policy and of the Act or LODR Regulations or any other statutory enactments, rules, the provisions of such Act or LODR Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the LODR Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

Further the board (including its duly constituted committee wherever permissible) shall review the policy on a regular basis, and they shall have power to amend, substitute, replace any of the provisions of this policy/ or the entire policy.

Annexure-1:

DOCUMENTS TO BE PRESERVED PERMANENTLY:

Companies Act, 2013:

1. Certificate of Incorporation
2. Memorandum and Articles of Association
3. Register of Members
4. Minutes of the board, committees of the board, general meeting
5. Register of Directors, Key Managerial Personnel and their shareholding
6. Register of loans, guarantee, security and acquisition made by the company
7. Register of contracts with related party and contracts and bodies etc. in which directors are interested.
8. Register of Charges
9. Register of investments not held in its name by the company
10. Register of transfer, transmission of securities
11. Foreign register of members, if any
12. Such other registers/documents as may be required to be maintained permanently under the Companies Act, 2013.
13. Scrutinizers' Report

SEBI LODR:

1. Listing Agreement executed with the stock exchange
2. Trading approval relating to listing of securities
3. Offer documents for public issue filed with SEBI.
4. Such other documents as may be required to be maintained permanently as per SEBI LODR

Other Act/Regulatory applicable laws:

As per applicable laws

DOCUMENTS TO BE PRESERVED UPTO 8 YEARS:

Companies Act, 2013:

1. Register of Buy-Back of securities from the date of completion of Buy-Back, if any
2. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings
3. Notices pertaining to disclosure of Interest by the Directors
4. Annual Return
5. Instrument creating charge or modification
6. Register of Deposits
7. Audited Financial Statements
8. Books of Accounts
9. Director's Report
10. Register of debenture holders or any other security holder
11. Such other registers/documents as may be required to be maintained for 8 years under the Companies Act, 2013.

SEBI LODR:

1. All reports filed with the stock exchange from time to time.
2. Disclosures of various events and press release.
3. Intimation of board meetings.
4. Disclosure of any material events or information.
5. Such other documents as may be required to be maintained for 8 years as per SEBI LODR

SEBI Prohibition of Insider Trading (PIT):

1. Maintenance of Structured digital database.
2. Such other documents as may be required to be maintained for 8 years as per SEBI PIT

Other Act/Regulatory applicable laws:

As per applicable laws

DOCUMENTS TO BE PRESERVED TEMPORARILY:

- Audio-Visual tape recordings or other electronic mechanism in connection with attendance of directors at Board Meetings/Committee Meetings of the Board through video conferencing facility.

It shall be preserved at least before the completion of Audit for that particular year in accordance with Rule 3 of Companies (Meetings of Board) Rules, 2014. Thereafter these can be destroyed with the approval of the Board.

- Any other document as may be approved by the board in accordance of applicable regulatory law(s).

Annexure-2:

**SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED OF/
DESTROYED**

Particulars of Documents along with provision of applicable laws	Date and Mode of Destruction	Initials of Authorised Person