



**FREDUN PHARMACEUTICALS LIMITED**

# **FREDUN PHARMACEUTICALS LIMITED**

## **POLICY ON PRESERVATION OF RECORDS & DOCUMENTS**

*[Pursuant to Regulation 9 read with Regulation 30(8) of SEBI Listing Regulations, 2015]*



## **FREDUN PHARMACEUTICALS LIMITED**

### **1. PREMBLE:**

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR**”) imposed certain obligations and disclosure requirements on all Listed Entities, one of the common obligations for all Listed Entities pursuant to Regulation 9 being is to formulate and have a policy for preservation of documents.

### **2. PURPOSE:**

The Purpose of this Policy is to ensure that the all the necessary documents and records of the Company required to be prepared and disclosed to the Stock Exchange are adequately protected and preserved as per the statutory requirements. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The Compliance Officer would be responsible for overseeing the implementation of the Policy.

### **3. DEFINITIONS:**

“**Board of Directors**” or “**Board**” shall mean the Board of Directors of Fredun Pharmaceuticals Limited, as constituted from time to time.

“**Company**” shall mean Fredun Pharmaceuticals Limited.

“**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

“**Listing Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR**”).

“**Stock Exchange**” shall mean BSE Limited.

Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015; Companies Act, 2013; or any other applicable law or regulations; as amended from time to time, to the extend applicable to the Company.

### **4. OBJECTIVE:**

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

- i. The documents of a permanent nature (**Annexure I**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.



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- ii. The documents to be maintained and preserved for the term not less than eight years (**Annexure II**) after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight (8) years. Provided further that the Company may keep the documents as specified above in an electronic mode.

### **5. PLACE OF PRESERVATION / MAINTENANCE:**

The Listing Records shall be preserved / maintained at the Registered Office of the Company unless any other law requires it to be maintained at the any other place, in which case the same shall be kept at such place.

### **6. ROLES AND RESPONSIBILITIES:**

The respective Departmental Heads under the supervision of the Compliance Officer of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

### **7. 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 department head(s). 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.

### **8. REGISTER OF DOCUMENTS DESTROYED:**

The Company shall maintain a Register as set out in Annexure III wherein entries shall be made in respect of the Documents / Records destroyed and shall be authenticated by the Compliance Officer of the Company or any other person as may be authorized by the Board.

### **9. ARCHIVAL POLICY:**

In compliance to Regulation 30((8) read with Regulation 46 of Listing Regulations the Company shall ensure that all the information disclosed on the Company's website ([www.fredungroup.com](http://www.fredungroup.com)) is maintained live and in archive for a period of 5 years.

### **10. AMENDMENTS TO THE POLICY:**

This Policy shall not be amended unless the amendment is approved by the Board of Directors or unless such amendment is required pursuant to change in the applicable law. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.



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**Annexure I**

Documents whose preservation shall be permanent in nature

<b>Sr. No.</b>	<b>Particulars</b>
1.	Registration Certificates.
2.	Licenses & Statutory Approvals.
3.	Statutory Registers required under applicable laws.
4.	Audited financial statements.
5.	Minutes of the Meetings of the Company.
6.	Material Agreements/Contracts.
7.	Orders issued by Courts/Statutory bodies.
8.	Investment Documents/proofs including certificates etc.
9.	Insurance Policies/ Claims under various policies.
10.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

**Annexure II**

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

<b>Sr. No.</b>	<b>Particulars</b>
1.	Books of Accounts & Annual Return(s)
2.	Correspondences with Government Departments/shareholders.
3.	Non-Statutory Registers/Documents.
4.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

**Annexure III**

Register of Documents Destroyed

<b>Sr. No.</b>	<b>Description of Documents Destroyed</b>	<b>Time upto which document was preserved</b>	<b>Date of Destruction</b>	<b>Mode of Destruction</b>	<b>Initials of Compliance Officer / Authorized Person</b>

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