

## **POLICY ON PRESERVATION OF DOCUMENTS**

### **INTRODUCTION**

The law requires Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject the Company to penalties fines etc.

The Board of Directors of Syngene International Limited (the “Company”) has adopted the following policy for preservation of documents per regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“Regulations”].

### **SCOPE**

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

### **PURPOSE**

The policy facilitates:

1. Retention of records for the periods required by applicable laws and regulations.
2. Retention of records for future reference to assure their availability when needed.
3. Preservation of the confidentiality and security of records.
4. Systematic disposition of records not necessary for legal or business reasons.

### **SECURITY, CONFIDENTIALITY & ACCESS**

#### **Access to Physical Files**

Physical files shall be maintained in a manner that prevents unauthorized individuals from gaining access to their contents within the Department.

#### **Access to Electronic Files**

Network and electronic files and records shall be maintained on limited access shared drives or by other approved methods.

### **PRESERVATION OF DOCUMENTS**

#### **1. Constitutional records/ records under Companies Act 2013**

##### **Documents to be preserved permanently (Indicative list)**

- a. Certificate of Incorporation.
- b. Memorandum of Association and Articles of association
- c. The register of members along with the index
- d. The minute books of General meetings

- e. The minutes books of the Board and committee meetings
- f. Circular resolutions passed by the Board/Committees
- g. Register of Renewed and Duplicate Share Certificates.
- h. The register of charges shall be preserved permanently.
- i. Register of investments, loans or guarantee provided to other Body corporate u/s 186.
- j. The particulars of investments in shares or other securities beneficially held by the company but which are not held in its own name u/s 187.
- k. Register of contracts or arrangements in which directors are interested u/sec 189.
- l. The books and papers of a company which has been amalgamated with, or whose shares have been acquired by, another company under this Chapter shall not be disposed of without the prior permission of the Central Government.
- m. Minutes of all Meetings of the transferor company, as handed over to the transferee company, shall be preserved permanently by the transferee company.

**Documents to be preserved for a period not less than 8 years after completion of the transaction (Indicative list)**

- a. Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto
- b. The register of debenture holders or any other security holders along with the index shall be preserved for a period of eight years from the date of redemption of debentures or securities.
- c. Attendance register of Board meeting and other committee meetings.
- d. The instrument creating a charge or modification thereon shall be preserved for a period of eight years from the date of satisfaction of charge by the company.
- e. Registers of deposits.- shall be preserved in good order for a period of not less than eight years from the financial year in which the latest entry is made in the register
- f. Disclosures by a director of his interest form MBP1-shall be preserved for a period of eight years from the end of the financial year to which it relates.
- g. Books of accounts and financial statements.

**Documents to be preserved for certain period**

- a. Preservation and safe custody of all books and documents relating to the issue of share certificates, including the blank forms of share certificates- for 30 years and in case of disputed cases, shall be preserved permanently.
- b. all certificates surrendered to a company shall immediately be defaced by stamping or printing the word “cancelled” in bold letters and may be destroyed after the expiry of three years from the date on which they are surrendered.

**AMENDMENTS AND UPDATES**

The Authorized Person/KMPs may review this Policy from time to time so that the policy remains compliant with applicable legal requirements. Any material changes to the Policy will need the approval of the Board of Directors. This policy was initially considered, discussed, and approved by the Company's Board of Directors. Subsequently, the Board revised this policy at its meeting on April 24, 2024.