

## **POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

*[Under Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

### **1. PREFACE**

The purpose of this document is to present a Policy of Hikal Ltd. (Company) regarding preservation and archival of its documents in accordance with the provisions of the Companies Act, 2013 and Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR” or “the SEBI Listing Regulations”). As per Regulation 9 of the SEBI Listing Regulations, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than eight years after completion of relevant transactions. Accordingly the Board of Directors of the Company had approved this policy for preservation and archival of documents/ records maintained by the Company either in physical mode or electronic mode on October 28, 2015, amended and updated since, from time to time.

### **2. PURPOSE**

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 statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding 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. Further, this Policy defines the time period for which material events likely to affect the working of the Company be disclosed on the Company’s website.

### **3. DEFINITIONS**

“**Act**” means the Companies Act, 2013 and Companies Act, 1956.

“**Board of Directors**” or “**Board**” means the Board of Directors of Hikal Ltd., as constituted from time to time.

“**Company**” means Hikal Ltd.

“**Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Material Events**” means events, as specified in Schedule III to the Listing Regulations and upon the occurrence of which the Company shall make disclosures to stock exchange(s) and host such disclosures on the Company’s website.

“**Policy**” means policy on Preservation and archival of records.

“**Preservation**” is maintenance of documents, files and records in usable form and to prevent from being altered, damaged or destroyed.

“**Records**” means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

## 2. POLICY:

### a) LEGISLATIVE FRAMEWORK AND STANDARDS

- Companies Act, 2013;
- Securities and Exchange Board of India Act, 1992 (including the Rules, Regulations and Circulars issued thereunder);
- The Securities Contracts (Regulation) Act, 1956;
- The Depositories Act, 1996;
- Foreign Exchange Management Act, 1999.

### b) MAINTENANCE OF RECORDS

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitalised in business processes.
- Physical records to be maintained in books and files.
- All digital and physical records to be saved at the registered / administrative office of the Company and no physical records can be migrated without permission of Company Secretary.
- A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.
- Disclosure of material events shall be hosted and retained on the Company’s website for a minimum period of 5(five) years. Further, depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company’s website for a longer period of time as decided by the Chairman and/ or Managing Director of the Company, from time to time.
- After the completion of the term of five years or such other extended term, the information would be archived under the heading “Past Disclosures” and would be retained on the website for a further period of three years or such term as may be decided by the Chairman and/ or the Managing Director of the Company, from time to time.

### c) DISPOSAL AND DESTRUCTION OF RECORDS

- All records mentioned in **Annexure A** which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.

- All records mentioned in **Annexure B** need to be preserved by the Company permanently during the entire life of the Company.
- Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
- The Company shall maintain a register as specified in **Annexure C**, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

**d) DISCLOSURE:**

This Policy will be communicated to all the employees and other concerned persons of the Company and be disclosed on the Company's website [www.hikal.com](http://www.hikal.com).

**3. AMENDMENT**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

**4. POLICY REVIEW**

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

Sr. No.	Annexure A	Annexure B
1	Proxy forms	Certificate of incorporation
2	Representation letters	Certificate of change of name (if any)
3	Annual reports	Common Seal
4	Annual returns	Memorandum and Articles of Association as amended from time to time
5	Consent and Resignation Letters received from the Directors	Counter folios of Share Certificates issued from time to time
6	Board Agenda and supporting Documents	Minutes Book
7	Office Copies of Notice of General Meeting and related papers	Circular resolutions
8	NSDL/CDSL Files	Statutory Registers
9	Annual financial statements including: - Annual Accounts - Directors report - Auditor's report	License & Permissions
10	Declaration by directors under section 164 of the Companies Act, 2013	Scrutinizers Reports
11	Declaration by directors under section 184 of the Companies Act, 2013	Register of members
12	All documents under the Listing Agreement	Index of Members
13	Notice of General Meetings and Board Meetings	Listing Agreement
14	Documents on which the common seal of the company has been affixed.	Central Government Approvals Received
15	Advertisements published	Any other Document / Information / Record as per the provisions of any other applicable Law or Regulation to the extent applicable to the Company.
16	Disclosures under takeover code	

### Annexure C

Sr. No	Particulars of Document destroyed	Date and mode of destruction with the initials of Secretary or other authorised Person

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