

# SUN PHARMACEUTICAL INDUSTRIES LIMITED

## POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL

Policy Versions				
Sl. No.	Description	Date of Approval	Date of	
			Commencement	
1	Adoption of new policy	22 May 2025	01 June 2025	



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#### I INTRODUCTION

Regulation 9 of the Securities and Exchange Board of India ('SEBI') (Listing Obligation and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), read with Regulation 30 of Listing Regulations, requires listed companies to formulated a policy, approved by their Board of Directors, for the preservation of documents and an Archival Policy.

In accordance with the abovementioned Regulations, the Company has formulated a Policy for Preservation of Documents and Archival Policy ("Policy") of Sun Pharmaceutical Industries Limited ("Company"). The Policy is framed in line with the existing provisions of Listing Regulations. Any future changes in the Listing Regulations will, ipso facto, apply to this Policy.

#### 2 OBJECTIVE AND SCOPE

The objective of the Policy is to ensure that all important documents generated or received by the Company are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate the destruction of documents that are no longer required at an appropriate time and in a specified manner.

The Policy establishes the guidelines for the management, retention, preservation, and destruction of documents, both in physical and electronic form, by the Company.

All Company documents shall be maintained in compliance with the requirements of the Applicable Laws, including the Companies Act, 2013 and SEBI Listing Regulations.

## PRESERVATION/ARCHIVAL OF DOCUMENTS/INFORMATION

The Preservation of Documents/information shall be as follows:

- a) Documents that shall be preserved permanently [Annexure A].
- b) Documents that shall be preserved for a period not less than eight (8) years [Annexure B]

Any documents for which there is a specific regulatory requirement for preservation shall be preserved accordingly.

All such events or information that has been disclosed to stock exchange(s) under Regulation 30 of SEBI Listing Regulations shall be hosted on the Company's Website for a period not less than five (5) years, after which the same may be archived.

In case there is any conflict between the definitions mentioned hereinabove and the Listing Regulations, then the definitions under the Listing Regulations, as amended from time to time, shall prevail.

## DESTRUCTION OF DOCUMENTS

After the statutory retention and preservation periods under this policy expire, the preserved documents may be destroyed in such a manner under the instructions approved by the Board of Directors or such persons as may be authorized by the Board of Director from time to time. . .



## 5 POLICY REVIEW

The policy shall be reviewed periodically as required under SEBI Listing Regulations or as and when required, keeping in view the changes in the regulatory requirements or on the discretion of Management, whichever is earlier.

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### Annexure A

## **Documents whose preservation shall be permanent in nature**

Sr. No.	Particulars	
1.	Company Incorporation Documents	
2.	Statutory Registers, Minutes of Meetings, Share certificates, Annual Returns, Forms and	
	other documents as prescribed under the Companies Act, 2013	
3.	Annual Reports and original signed Financial Statements	
4.	Merger Order(s) issued by the Hon'ble High Court/National Company Law Tribunal and	
	Merger related agreements	
5.	Licenses, Approvals and Product Registrations issued by Statutory Authorities, Central &	
	State Governments or Regulatory bodies	
6.	Intellectual Property and Trademarks	
7.	Property/Asset agreements, title deeds and records	
8.	Standard Operating Procedures and Policies	
9.	Records of employees' data	
10.	Any other document as may be required to be maintained permanently in terms of	
	applicable law	

#### Annexure B

## Documents with a preservation period of not less than eight years after completion of the relevant transaction

Sr. No.	Particulars	
1.	Books of Accounts, Audit related documents, Invoices, Bank Statements	
2.	Submissions to the Stock exchanges pursuant to SEBI Listing Regulations	
3.	Agreements, Contracts and other legal documents	
4.	Court Orders and Litigation files	
5.	Tax returns and records	
6.	R&D documents	
7.	Clinical research documents	
8.	Regulatory, analytical and laboratory records	
9.	Manufacturing records	
10.	Inspection related records	
11.	Sales and marketing documents	
12.	Any other document as may be required to be maintained in terms of applicable law	