

## **PRESERVATION OF RECORDS POLICY**

### **Preamble:**

The Securities and Exchange Board of India (SEBI) vide its notification issued on 2<sup>nd</sup> September, 2015 has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') to come into force with effect from the 90<sup>th</sup> day from the date of publication in the Official Gazette (i.e. effective from 1<sup>st</sup> December, 2015) and repealed the clauses under Listing Agreement entered into by the Companies with the Stock Exchange(s). As per Regulation 9 of the 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 Jyothy Laboratories Limited has approved this policy for preservation of documents/ records maintained by the Company either in physical mode or electronic mode.

### **Purpose of the policy:**

The purpose of this policy is to lay down a framework for effective management of the records at the Company and to ensure the preservation and protection of the records as per the statutory requirements. This policy is also meant to set principles underlying the Company's approach to preservation of its records and to define the obligation of the employees in retaining and preserving the records which are required to be maintained as per the applicable statutory and regulatory requirements.

### **Definitions:**

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

**“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.

**“Company”** means **Jyothy Laboratories Limited.**

**“Board of Directors”** or **“Board”** means the Board of Directors of Jyothy Laboratories Limited, as constituted from time to time.

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

**“Storage Options”** means

**Online storage:** Records are kept on a server or hard drive and are immediately available for use over a network. This option is best for records that must be accessed frequently.

**Near-line storage:** Records are stored on media such as optical disks in jukeboxes or tapes in automated libraries which are attached to a network. Because retrieval is slower than with online storage, this option is most appropriate for records that are accessed occasionally.

**Offline storage:** Records are stored on removable media and must be manually retrieved. This option provides the slowest access and would be used for records that are only rarely needed.

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

**Policy:**

**a) LEGISLATIVE FRAMEWORK AND STANDARDS**

- Companies (Preservation and Disposal of Records) Rules, 1966
- Companies Act, 2013.
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**b) MAINTAINENCE 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 digitised in business processes.
- Physical records to be maintained in books and files.
- All digital and physical records to be saved at the registered 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.

**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 operational employees and other concerned persons of the Company and be disclosed on the Company's website [www.jyothylaboratories.com](http://www.jyothylaboratories.com).

<b>Sr. No.</b>	<b>Annexure A</b>	<b>Annexure B</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:	License & Permissions
10.	-Annual accounts	Scrutinizers Reports
11.	-Directors report	Register of members
12.	-Auditor's report	Index of Members
13.	Declaration by directors under section 164 of the Companies Act, 2013	Listing Agreement
14.	Declaration by directors under section 184 of the Companies Act, 2013	Central Government Approvals received
15.	All documents under the Listing Agreement	
16.	Notice of General Meetings and Board Meetings	
17.	Documents on which the common seal of the company has been affixed.	
18.	Advertisements published	
19.	Disclosures under takeover code	
20.	Inward file giving information about the various correspondence received from outside agencies requiring secretarial action	

**Annexure C**

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