

AUROBINDO PHARMA LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents. The Board of Directors of Aurobindo Pharma Limited ("the Company") is required to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

This policy attempts to preserve and maintain documents of the organization. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organization. In order to preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

This Policy is effective from 1st December 2015.

2. DEFINITIONS

A. "**Act**" means the Companies Act, 2013, rules framed thereunder and any amendment thereto.

B. "**Board**" means the Board of Directors of Aurobindo Pharma Limited, as constituted from time to time.

C. "**Company**" means Aurobindo Pharma Limited.

D. "**Documents**" means 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.

E. "**Electronic Form/Mode**" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

F. "**Listing Regulations**" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

G. "**Policy**" means policy on preservation of documents.

H. "**Preservation**" means maintenance of documents and files in usable form and prevent from being altered, damaged or destroyed.

3. OBJECTIVE

The objective of this policy is to establish the frame work needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned authorized person with preservation, so as to ensure integrity of the documents and prohibit unauthorized access.

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

A. The documents of a permanent nature (listed in **Annexure 1**) 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. The Company may keep the documents as specified above in physical form or in an electronic form.

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

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. The Company may keep the documents as specified above in physical form or in an electronic form.

Provided all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

4. MAINTENANCE OF DOCUMENTS

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

* Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitized in business processes.

- * Physical documents 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 the respective Department Head.
- * A reproduction of any original record on microfilm or on any other medium shall be certified by the respective Head of Department of the Company to be a true and accurate reproduction of the original of such document.

5. ROLES & RESPONSIBILITIES

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

6. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

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. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on internal HR portal of the Company.

9. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

Annexure 1

Documents whose preservation shall be nature of Document(s) permanent in nature

Sl. No.	Nature of Document(s)
1	Registration Certificates
2	Licenses & Statutory Approvals
3	Statutory Registers and Forms required under applicable laws
4	Audited financial statements
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Material Agreements/Contracts
9	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure -2

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

Sl. No.	Nature of Document(s)
1	Books of Accounts
2	Annual Return(s)
3	Personnel Documents
4	Insurance Policies/ Claims under various policies
5	Correspondences with Departments/shareholders
6	Non-Statutory Registers/Documents
7	Films, Videos, CDs, DVDs, tapes etc.
8	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.