



ANGLO-FRENCH DRUGS & INDUSTRIES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

INTRODUCTION

This policy is primarily framed in pursuance of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”).

The policy not only covers the various aspects on preservation of the Documents, but is also beneficial for the safe disposal/destruction of the Documents and keeping a record of the same.

DEFINITIONS

“**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law or otherwise, maintained on paper or in Electronic form received or kept in pursuance of any Act or law for and does not include multiple or identical copies.

“**Electronic Record(s)**” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

“**Electronic Form**” means on any 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.

“**Maintenance**” means keeping Documents, either physically or in electronic form.

“**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.



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OBJECTIVE OF THE POLICY

The objective of this policy is to ensure compliance with Regulation 9 of the Listing Regulations to have a policy approved by Board of Directors classifying them in at least two categories as follows:

- I. Documents whose preservation shall be permanent (*Annexure - I*) and
- II. Documents with a preservation period of not less than 8 years (*Annexure - II*).

SCOPE OF THE POLICY

This Policy is applicable to all the Documents maintained in physical and electronic form in the Company. The Documents not covered under this policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

PRESERVATION OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules and regulations as may be applicable to the Company from time to time.

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.



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FORM OF MAINTAINING DOCUMENTS

Unless specifically provided in any law or regulation, the Company shall at its discretion maintain the Documents in Physical or Electronic mode depending upon the significance of the Document. Further the Company may convert the physical documents in electronic mode to ensure ease in maintenance of records and efficient utilization of space.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode as found to be appropriate by the authorised person. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/ unimportant/ irrelevant. This will apply to both physical and electronic Documents.

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.



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ANNEXURE - I

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMENANT IN NATURE

Sr. No.	Nature of Document(s)
1.	Memorandum and Articles of Association
2.	Certificate of Incorporation
3.	Attendance Registers – Board, Committee and General Meetings
4.	Minutes of Board, various Committees and Shareholder Meetings
5.	Listing Agreement executed with Stock Exchanges
6.	Registration Certificates under various applicable laws
7.	Licenses & Statutory Approvals
8.	Statutory Registers and Forms required under various applicable laws
9.	Audited Financial Statements
10.	Material Agreements/ Contracts
11.	Investment documents/ proofs including certificates etc.
12.	Orders issued by Courts/ Statutory bodies
13.	Tax exemption and related documents
14.	Any other document as may be required to be maintained in terms of applicable laws to be maintained and preserved from time to time.



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ANNEXURE - II

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

Sr. No.	Nature of Document(s)
1.	Books of Accounts including vouchers and bills
2.	Notices and Notes to Agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
3.	Annual Returns together with Annexures
4.	Scrutinizer's Report on voting on General Meetings/ Postal Ballot
5.	Dividend reconciliation Statement till the time Dividend is transferred to IEPF
6.	Correspondences with Departments/ Shareholders
7.	Excise returns, Income Tax returns, Sales Tax/ VAT Returns, Service Tax returns
8.	Films, Videos, CDs, DVDs, Tapes etc.
9.	Any other document as may be required to be maintained in terms of applicable laws to be maintained and preserved from time to time.