

**POLICY ON**  
**RECORDS AND ARCHIVE MANAGEMENT**



**Sudeep Pharma Limited**  
129/1/A GIDC, Nandesari, Vadodara-391340, Gujarat, India.  
CIN- U24231GJ1989PLC013141

Details of Adoption/Amendments to the Policy				
Policy Adoption/Change effective date	Clause No.	Particulars of the Adoption/Change	Board Approval date	Version of the Policy
Policy adoption	-	New Policy	27.03.2025	Original

  




## 1. Preamble

- 1.1 The Board of Directors of Sudeep Pharma Limited has approved the “Records and Archive Management Policy” for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode at their meeting held on 27<sup>th</sup> March 2025 and the same will in effect from 27<sup>th</sup> March 2025.
- 1.2 This policy has been formulated in accordance to Regulation 9 and Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 2. Purpose and Scope

- 2.1 The purpose of this document is to present a policy statement for Sudeep Pharma Limited (“*The Company*”) regarding preservation of documents in accordance to the provisions of the Companies Act, 2013 and of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- 2.2. The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

## 3. Coverage

This Policy is intended to guide the employees of the Company to understand the maintenance, preservation and disposal of documents as per the applicable statutory and regulatory requirements.



#### 4. Classification and Administration

4.1 The Record Retention Schedule is given at **Appendix A**, classifies the period of preservation of documents and is approved as Initial Schedule for maintenance, preservation and disposal of documents.

4.2 The Company may preserve the documents in physical/electronic mode.

4.3 It would be the responsibility of the concerned Departmental Heads to ensure the implementation process and procedures of the Record Retention Schedule pertaining to their designated work area. They are expected to take into account the potential impact of their decision to retain/preserve or destroy the document pertaining to their work area and observe the compliance requirement of the applicable law.

#### 5. Periodical Review

5.1 The policy should be reviewed periodically by The Board of Directors, Key Managerial Personnel and the Compliance Officer of the Company or such person as authorised by the Board in this behalf. (*"The Administrators"*).

5.2 The Administrators are authorised to make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with the local, state and Central Laws and monitor the compliance with this Policy.

5.3 The amendments to the policy shall be subject to approval by the Board, as and when required. The decision of the Board in this respect shall be final and binding.

#### 6. Disposal/ Destruction of Documents

6.1 The documents of the company which are no longer

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required as per the time schedule prescribed in Appendix A may be destroyed upon approval and instruction of the Administrators severally.

**6.2** The details of the documents destroyed by the Company shall be recorded in the Register of Disposal of records to be kept by the Employees of the designated work areas, who are disposing of the documents in the format prescribed at **Appendix B.**

**7. Suspension of Record/ Disposal in the event of Litigation or Claims**

7.1 In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of.

7.2 The Employees shall immediately be informed of suspension of further disposal of documents.

**8. Conversion of Form and Authenticity**

8.1 The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

8.2 This will be done after obtaining approval of the Managing Director.

8.3 When a Document is maintained both in physical form and in electronic form, the authenticity with reference to the physical form should be considered for every purpose.

**9. Communication of the Policy**

9.1 For all new Employees and Directors, a copy of this Policy



shall be provided as a part of the joining documentation, along with other HR Related policies.

9.2 For all existing Employees and Directors, a copy of this Policy shall be provided within one month of the adoption of this Policy by the Board of Directors of the Company.

9.3 This Policy shall also be posted on the web-site of the company.

## **10. Archival Policy**

10.1 Any disclosure of events or information which have been submitted by the Company to the Stock Exchange(s) under Regulation 30 of the Listing Regulations and Policy of the Company (Disclosed Information) will be available on the website of the Company for a minimum period of five years from the date of its disclosure.

10.2 Disclosed Information which are over five years old will be archived from the website of the Company.

10.3 Any person intending to review those disclosed information may write to the Compliance Officer of the company.

## **11. Interpretation**

Under any circumstances, where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

## **12. 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.



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**APPENDIX –A**  
**RECORD RETENTION SCHEDULE**

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*[For Hard as well as Electronic Copies]*

The Company from time to time establishes retention or destruction of documents or schedules or policies for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

**A. Tax Records:**

- (i) Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues.
- (ii) Tax records may be retained for at least Eight years from the date of filing the applicable return.

**B. Financial Records:**

- (i) Financial Records include, but may not be limited to, books of accounts, ledger, vouchers, bank statements, investment records, Annual Plans & budgets, and other documents concerning the company's revenues.
- (ii) Financial Records may be retained for a period of 8 years from the completion of assessment year or audit completion, which is later.



**C. Legal Files/Agreements/Contracts:**

- (i) Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.
- (ii) Final, executed copies of all agreements/contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least eight (8) years beyond the life of the agreement/contract and longer in the case of publicly filed contracts/agreement.

**D. Employment /Personnel Record:**

Several Central & State statutes require the Company to keep certain recruitment, employment and personnel information. The Company should also keep personnel files that reflect performance reviews and any complaints brought against the Company or individual employees under applicable Central & State statutes. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Employment and personnel records should be retained in accordance with the applicable laws and regulations, quality/technical certification requisites and customer requirements, whichever is later.

**E. Quality/Technical Records:**

The Quality/Technical Records should be retained in accordance to the applicable retention guidelines of quality certifications or the customer requirements, whichever is later.

**F. Marketing and Sales Documents:**

The Company should keep final copies of marketing and sales documents in accordance with the applicable laws and regulations, quality/technical certification requisites and customer requirements, whichever is later.



whichever is later.

**G. Records of the Board and Committees of the Board:**

Minutes of Meeting of the Board and the Committees of the Board, thereof, should be retained in perpetuity in the Company's minute book. A clean copy of all Board and Board Committee materials should be kept as long as they remain current or for 8 financial years, whichever is later.

**H. Corporate Records**

Corporate Records such as but not limited to certificate of incorporation, commencement of business, listing agreement, common seal, annual reports originals, License and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals, etc., shall be preserved permanently.

**I. Press Releases/Public Filings/Stock Exchange & ROC Filings:**

The Company should retain permanent copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any document a member of the public can theoretically produce against that Company. Press releases / public filings related documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.

**J. Development/Intellectual Property and Trade Secrets:**

Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:

- (i) Derives independent economic value from the secrecy of the information;
- (ii) The Company has taken affirmative steps to keep the information confidential.

The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.



**K. Electronic Mail:**

E-mail that needs to be saved should be either:

- (i) Printed in hard copy and kept in the appropriate file; or
- (ii) Downloaded to a computer file and kept electronically or on disk as a separate file.

Electronic documents will be retained as if they were paper documents. Therefore, the electronic files should be maintained for the appropriate amount of time depending upon the subject matter of the email and should be determined primarily by the application of the general guidelines affecting document retention. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods should be tested on a regular basis.

**L. Web page files**

The website page files may be retained for a period of 5 years as specified in SEBI’s Listing Regulations, 2015.

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