

**RAJASTHAN ANTIBIOTICS LTD**

**ARCHIVAL POLICY**

**AND**

**POLICY ON PRESERVATION OF DOCUMENTS**



## **ARCHIVAL POLICY AND POLICY ON PRESERVATION OF DOCUMENTS**

### **(Under Regulation 9 and 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)**

#### **1. PREAMBLE**

Regulation 9 and 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) requires every listed company to have a policy on Preservation of Documents and archival of documents in the website maintained by the Company.

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 gives guide lines 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.

The Regulation requires the Board of Directors of a company to frame a Policy for Preservation of Documents classifying them into two categories:

- (i) Documents whose preservation shall be permanent; and
- (ii) Documents to be preserved for not less than eight years after completion of the relevant transaction.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. Rajasthan Antibiotics Limited (hereinafter referred to as the “Company”) recognizes that documents whether in physical or electronic mode, forms an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

This policy has been approved by the Board of Directors in its meeting held on January 05, 2022.

#### **2. APPLICABILITY**

This Policy is applicable to all Documents maintained in physical/ electronic mode by 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.

This policy has been bifurcated into part i.e :

- Part-I - “Archival Policy” and**
- Part-II - “Policy on Preservation of Documents”**

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in Annexure 1 & 2 shall be preserved accordingly.

### 3. DEFINITIONS

- a) “**Act**” means the Companies Act, 2013.
- b) “**Applicable Law**” means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI) and Ministry of Corporate Affairs (MCA).
- c) “**Board of Directors**” or “**Board**” shall mean the Board of Directors of the Company, as constituted from time to time.
- d) “**Books of Accounts**” as defined in Section 2(13) of the Act.
- e) “**Company**” shall mean Rajasthan Antibiotics Ltd or “**RAL**”.
- f) “**Documents**” refers to papers, records, files, tapes, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challans, CDs, DVDs, electronic storage devices, audio/video recordings or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- g) “**Electronic Form**” means any electronic device such as servers, computer, laptop, compact disc, pen drive, 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.
- h) “**Maintenance**” means keeping documents, either physically or in Electronic Form.
- i) “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.
- j) “**SEBI Listing Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

Any term, word and phrases not defined herein shall have the same meaning as defined in the Companies Act, 2013, Regulations or any other applicable law or regulation to the extent applicable to the Company.

### 4. DESTRUCTION OF RECORDS

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records, which are due for disposal wherever required, approval of Board will be taken for disposal of certain documents.

The Company shall maintain a register of disposal of records in the custody of the Company Secretary and Compliance Officer of the Company, wherein the brief particulars of the records disposed of shall be entered.

The register of disposal of records shall contain the following columns:

- Item Number;
- Brief Particulars of the records disposed of;
- Date of approval for disposal of records;
- Date of disposal; and
- Mode of destruction



- This register of disposal of records shall be maintained permanently by the Company with the assistance of the Company Secretary and Compliance Officer either in physical or electronic form.

## **5. SUSPENSION OF RECORDS DISPOSAL IN THE EVENT OF LITIGATION/CLAIMS**

In the event the Company is served with any notice for documents from any statutory authority or any litigation is commenced by or against the Company, then the disposal of documents including e-mail, which is related to the matter of notice/litigation, etc. shall be suspended until such time the matter is settled or resolved or disposed off. The Company Secretary and Compliance Officer shall immediately inform all employees of the Company for suspension of further disposal of Documents.

## **6. POLICY REVIEW**

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

## **7. DISCLOSURE OF THE POLICY**

The Company shall disclose this policy on its website i.e [www.rallife.com](http://www.rallife.com)

### **PART-I – ARCHIVAL POLICY**

Any disclosure of events or information which has been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of five (5) years from the date of its disclosure and after completion of 5 years, the same shall be archived by the Company for a further period of two years. Thereafter such events or information may cease to be displayed on the website of the Company.

### **PART-II – POLICY FOR PRESERVATION OF DOCUMENTS**

This part of policy sets the standards for managing, storing and preservation of documents of the Company 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:

Provided that 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:

- i) provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years, and;
- ii) provided further that the Company shall keep the documents as specified above in an electronic mode.

#### **ANNEXURE – 1**

#### **DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE IN THE ARCHIVES OF THE COMPANY**

- (i) Incorporation Documents.
- (ii) Memorandum and Articles of Association as amended from time to time.
- (iii) Registration certificates required under applicable laws.
- (iv) Statutory Registers required to be kept permanently under Companies Act, 2013
- (v) Minutes of the proceedings of Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots, resolutions passed by circulation and the meetings of creditors.
- (vi) Agreements made and approvals received by the Company from Stock Exchanges & Depositories.
- (vii) Any Orders issued by Courts /Statutory Bodies / any other Regulatory Authority. (viii) Audited Financial Statements and Auditors Report.
- (ix) Property records including purchase and sale deeds, licenses, copyrights, patents & Trademarks.
- (x) Register of Disposal of records.
- (xi) Any other documents as may be required to be maintained permanently in terms of applicable law(s) from time to time.

#### **ANNEXURE – 2**

#### **DOCUMENTS TO BE PRESERVED AND MAINTAINED FOR A PERIOD OF EIGHT (8) YEARS FROM THE DATE OF ITS EVENT, UNLESS SPECIFIED UNDER ANY ACT OR RULES, FOR A LONGER DURATION**

- (i) Under the Companies Act 1956 / Companies Act, 2013:
- (ii) Notices, Intimations, Agenda, Agenda notes, draft minutes and other relevant papers circulated to members of Board of Directors relating to Board Meetings, Committee Meetings, Independent Directors Meetings.
- (iii) Attendance Register of Board & Committee Meetings and General Meetings.
- (iv) Notices of General Meetings and Postal Ballots. Scrutinizer's Report on E-Voting, Poll and Postal Ballot.
- (v) Documents / Instruments relating to creation, modification or satisfaction of charges from the date of complete satisfaction of any Charge.
- (vi) Income Tax Returns filed under Income Tax Act, 1961.
- (vii) All notices pertaining to disclosure of interest of Directors and KMPs.
- (viii) Register and Index of Debenture-holders or any other security holder.
- (ix) Annual Returns together with its Annexure and Annual reports.
- (x) Forms and returns filed with RBI / MCA or with any other Statutory Authority



- (xi) Books of Accounts including vouchers, bills and Voucher Register.
- (xii) Register of Transfer and Transmission of shares / Debentures and other securities. (xiii) Dividend reconciliation statement till the time the dividend is transferred to Investor Education Protection Fund.
- (xiv) Register of Deposits accepted and renewed
- (xv) Register of Employee Stock Options.
- (xvi) Any other documents /registers as may be required in terms of applicable law(s), which are required to be preserved for a period of not less than eight years, shall be maintained and preserved accordingly from time to time.

## 2. Documents filed with Stock Exchanges under SEBI Regulations :

All disclosures and intimations filed under:

- (i) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (ii) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- (iii) SEBI (Prohibition of Insider Trading) Regulations, 2015.
- (iv) SEBI (Share Based Employee Benefits) Regulations, 2014.

\*\*\*\*\*