



**POLICY ON
PRESERVATION OF
DOCUMENTS**

SHEEL BIOTECH LIMITED



1. PREAMBLE

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) requires every listed company to formulate a Policy on Preservation of Company Documents which shall be approved by the Board of Directors.

Accordingly, this policy is made and approved by the Board of Directors in its meeting on October 18, 2023.

2. OBJECTIVE OF THE POLICY

Thus, this policy (“Policy”) is framed with an objective of classifying records, registers, returns etc. in at least two categories as follows-

- (a) documents whose preservation shall be permanent in nature;
 - (b) documents with preservation period of not less than eight years after completion of the relevant transactions:
- for the purpose of such maintenance and preservation as prescribed.

3. DEFINITIONS

Unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Code, shall have the meaning assigned to them below:

- i. **“Books of Accounts”** as defined in Section 2(13) of the Act.
- ii. **“Company”** means Sheel Biotech Limited.
- iii. **“Documents”** shall mean 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.
- iv. **“Maintenance”** means keeping documents, either physically or in Electronic Form
- v. **“Policy”** means this Policy on Preservation of Company Documents.
- vi. **“SEBI Listing Regulations”** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

4. PRESERVATION OF DOCUMENTS

The Documents shall be preserved under following two categories:

(i) PERMANENT NATURE:

The documents of a **permanent nature** which is given in Annexure 1 shall be maintained and preserved permanently by Sheel biotech Limited (“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.



(ii) SPECIFIED PERIOD

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions which is given in Annexure 2 which 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.

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

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, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed off. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy. They shall also designate an authorised person who shall ensure compliance of this Policy.

5. DESTRUCTION OF DOCUMENTS

The documents specified in Annexure 2 which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and manner as specified and approved by the Functional/ Departmental Heads.

6. AMENDMENT TO THE POLICY

The policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors. However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

SHEEL BIOTECH LIMITED



“ANNEXURE – 1”
DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

Sr. No.	Documents
1.	Property records including purchase and sale deeds, licences, copyrights, patents &trademarks
2.	Certificate of Incorporation
3.	Minutes of Board, Committee and Shareholders’ Meetings
4.	Register of Members and other Statutory Records
5.	Personal files of all live employees
6.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

“ANNEXURE – 2”
DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS
AFTER COMPLETION OF RELEVANT TRANSACTION

Sr. No.	Documents
1.	Books of account including relevant books and papers and financial statements.
2.	Disclosures/ notices by a director of his interest
3.	Instrument creating a charge or modification
	Annual return and copies of all certificates and documents required to be annexed thereto
4.	Registers of Fixed assets
5.	Attendance Register of Board Meetings
6.	Attendance Register of Committee Meetings
7.	Attendance Slips of General Meetings
8.	Register of Deposits
9.	Register of Proxies
8.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.