

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

(PURSUANT TO REGULATION 9& 30 (8) OF SEBI
(LISTING OBLIGATIONS AND DISCLOSURE
REQUIREMENTS), REGULATIONS 2015

(LISTING REGULATIONS))



SUNIL HEALTHCARE LIMITED

(A WHO-GMP Certified Company)

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POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

(In compliance of Regulation 9 & 30 (8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

LEGAL FRAMEWORK

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. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources. The Board of Directors of Sunil Healthcare Limited (“the Company”) is required to formulate a policy for “**Preservation of Documents**” to comply with the requirements of Regulation 9 of the aforesaid Listing Regulations.

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this Regulation 30 (8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

PURPOSE AND SCOPE

The purpose of this documents to present a high level policy statement for Sunil Healthcare Limited (SHL) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”)

The policy is intended to define SHL’s preservation of documents responsibilities and to provide guidance to the executives and staff working in SHL in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frame the guidelines for fundamental accountability of SHL to retain and preserve its documents as the basis for communication with a range of external stakeholders

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.

EFFECTIVE DATE

This Policy is effective from December 1, 2015.

DEFINITIONS

- A** **“Authorised Person”** means any person duly authorised by the Board.
- B** **“Act”** means the Companies Act, 2013.
- C** **“Applicable Law”** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and the Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- D.** **“Board of Directors” or “Board”**
Board of Directors or Board shall mean the Board of Directors of Sunil Healthcare Limited as constituted from time to time.
- E.** **“Company”** Company shall mean **“Sunil Healthcare Limited”**.
- F.** **“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 and include summons, notices, requisition, order, declaration, form and register issued, sent or kept in pursuance of any law for the time being in force or otherwise maintained on paper or electronic form.
- G** **“Electronic Form”** 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.
- H** **“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection(1) of section 2 of the Information Technology Act, 2000.
- I.** **“Listing Regulations”**
Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).
- J** **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- K** **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

CLASSIFICATION OF THE DOCUMENTS

This 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 as prescribed under Companies Act, 2013 & Rules made there under Income Tax, Sales Tax,

Central Excise and Service Tax related documents, i.e., Assessment Orders, Tax Bills, Receipts, Statements, Returns, Notices, etc shall be preserved for a period of 8 years as required under the applicable laws.

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

Provided further that the Company may keep the documents as specified above in an electronic mode.

ROLES & RESPONSIBILITIES

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

PERIODICAL REVIEW OF THE POLICY BY TOP MANAGEMENT

The Policy should be flexible and easy to understand and comply with by all levels of employees. The policy should be reviewed periodically by the Top Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

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.

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. The company may be kept the record of aforesaid destructions documents in the below mention format. This applies to both Physical and Electronic Documents.

The format of the register of Documents disposed/destroyed:-

| Sr. No | Nature of Documents | Time upto which document was preserved | Date of destruction | Mode of destruction | Department /Authority | Signatory of the authorised person |
|---------------|----------------------------|---|----------------------------|----------------------------|------------------------------|---|
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SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the company or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. Such documents shall be preserved until the completion of the judicial proceedings.

COMMUNICATION AND DISSEMINATION OF THE POLICY

All the Employees of the Company, whether existing or new, shall be informed about this policy and they shall read and download the full policy from the web-site of the Company i.e. www.Sunilhealthcare.com

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.

ARCHIVAL OF THE DOCUMENTS

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30 of Chapter IV of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, and such disclosures shall be hosted on the website of the Company for a minimum period of five years. The Company shall disseminate the information specified in Regulation 46 of Chapter IV of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 on its website.

Annexure -1

Documents whose preservation shall be permanent in nature

| Sr. no | Nature of the Documents |
|---------------|--|
| 1 | Incorporation Certificates including the commencement of Business Certificate |
| 2 | Memorandum and Article of Association, as amendment time to time |
| 3 | Licenses & Statutory Approvals issued and given by the various authorities |
| 4 | Statutory Registers / Compliances required under applicable laws |
| 5 | Audited financial statements |
| 6 | Minutes of General Meeting , Board Meeting and various Committee Meetings |
| 7 | Standard Operating Procedure (SOP) relating to the various activities of the Company |
| 8 | Annual Reports and Annual Returns of the company filed under Companies Act-1956/2013 |

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| 9 | Material Agreements/Contracts in permanent nature |
| 10 | Orders issued by Courts/Statutory bodies |
| 11 | Investment Documents/proofs including certificates etc. |
| 12 | Building Approval, Drawing and related documents |
| 13 | Documents related to the Land owned or leased taken by the company |
| | 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

| Sr. no | Nature of the Documents |
|---------------|--|
| 1 | Books of Accounts |
| 2 | Personnel Documents of the employee subject to the cessation of the employee |
| 3 | Insurance Policies/ Claims under various policies |
| 4 | Correspondences with Departments/shareholders |
| 5 | Service Tax /Excise /sales tax/vat/income tax / PF/ESI Documents and others |
| 6 | Documents in digital form kept in Videos, CDs, DVDs, tapes , Hard disks, pen drive etc. |
| 7 | Charge Creation documents |
| | Material Agreements/Contracts except mentioned in point no 9 of Annexure -1 |
| | Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time. |