

BAL PHARMA LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

(Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

1. Preface

The Board of Directors (the “Board”) of Bal Pharma Limited (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”) at their meeting held on 9.11.2015. This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) and will come into existence from 1st December 2015.

2. Purpose of the Policy

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3. Administration

Attached as Appendix A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

5. Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The Administrator may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at Appendix B.

6. Suspension of Documents disposal in the event of Litigation or Claims

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. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

7. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

8. 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.

APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organised as follows:

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A: Corporate Records

Documents to be retained Permanently:

Sl. No	Record Type	Preservation Period
01	Common Seal	Permanent
02	Minutes books of Board, Committee and General Meetings	Permanent
03	Statutory Registers	Permanent
04	License and Permissions	Permanent
05	Statutory Forms except for routine compliance	Permanent
06	Scrutinizers Reports	Permanent
07	Register of Members	Permanent
08	Index of Members	Permanent

09	Memorandum of Association and Articles of Association	Permanent
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Documents to be retained for a minimum period of 8 years:

SI No	Record Type	Preservation Period
01	Annual Returns	8 years from the date of filing with MCA.
02	Attendance Register	8 Years
03	Office copies of the Notice of General Meeting and related papers	8 Years
04	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers.	8 Years
05	Register of Debenture Holders, if any	8 Years after the redemption of Debentures
06	Index of debenture-holders, if any	8 Years after the redemption of Debentures

B: Accounts and Finance

SI No	Record Type	Preservation Period
01	Annual Audit Reports and Financial Statements	Permanent
02	Annual Plans and Budgets	8 years after completion of audit.
03	Books of Accounts, Ledgers and Vouchers	8 years from the end of financial year or completion of assessment under Income Tax act, whichever is later.
04	Bank Statements	8 Years
05	Investments records	8 Years
06	General Correspondence	3 Years

C: Tax Records

SI No	Record Type	Preservation Period
01	Tax Exemption and Related documents	Permanent
02	Tax Bills, receipts and payments	Permanent
03	Excise Records	8 years from the end of the

		Financial Year or completion of assessment under the applicable law, whichever is later.
04	Tax Deducted at Source Records	8 years from the end of Financial Year or completion of assessment under the applicable law, whichever is later.
05	Income Tax Documents	8 years from the end of Financial Year or completion of assessment under Income Tax, whichever is later.
06	Service Tax Documents	8 years from the end of Financial Year or completion of assessment under Service Tax, whichever is later.
07	GST related documents	8 years form the date of filing forms/returns.

D: Legal Files and Records

SI No	Record Type	Preservation Period
01	Court Orders	Permanent
02	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts.
03	Legal Memoranda and Opinions including subject matter files.	3 years after the closure of the litigation.
04	Litigation Files	3 years after the closure of the litigation.

E: Property Records

SI No	Record Type	Preservation Period
01	Original Sale deeds and Purchase Agreements	Permanent
02	Property Card, Index II, Ownership records issued by Government Authority.	Permanent
03	Property Insurance records and renewals	Permanent

F: Project

SI No	Record Type	Preservation Period
01	Project Documents and Related correspondence (including any proposal of the Project and its approval)	Permanent

G: Correspondence and Internal Memo

SI No	Record Type	Preservation Period
01	Those pertaining to non-routine matters or having significant lasting consequences.	Permanent
02	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none">• Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings;• Letters of general enquiry and replies that complete cycle of correspondence;• Letter of compliant requesting specific actions that have no further value after change of name or address;• Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.	3 Years

H: Insurance Records

SI No	Record Type	Preservation Period
01	Insurance Policies	Permanent
02	Claims records	Till settlement is over and claim money is received.
03	Group Insurance Plans	Until plan is amended or terminated

I: Personnel Records

SI No	Record Type	Preservation Period
01	Payroll Registers	Permanent

02	Bonus, Gratuity and other Statutory Records	Permanent
03	Time office Records and Leave Cards	8 Years
04	Unclaimed Wages Records	8Years
05	Employees Information Records	8 Years from the date of separation.
06	Employee Medical Records	3 Years from the date of separation.

J. Electronic Records

Electronic Mail		
	<ul style="list-style-type: none"> • All e-mails received from Internal and External Sources may be deleted after 8 years. • Employees will strive to keep their e-mails related to business issues. • All Emails related to business issues should be downloaded to a server or user directory on server. • Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources. • All e-mails of Employees which are important should be copied to the employees' folder. 	
Web Page Files: Internet Cookies	<p>All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.</p> <p>The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy.</p> <p>Each month the Company will run backup copy of all Electronic files including email on to the servers.</p> <p>This backup is to safeguard retrieval of lost information within 1 year retrieval period. The backup copy is considered as a safeguard for the record retention system of the Company.</p> <p>In certain cases, document will be maintained both paper and electronic form.</p>	

APPENDIX – B-FORMAT OF THE REGISTER FOR DISPOSAL OF DOCUMENTS/RECORDS.

Sl. No	Particulars of Documents Destroyed	Date and Mode of Destruction with the initials of the authorized person.