



EMCURE PHARMACEUTICALS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

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1. Preamble:

Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors of a listed entity is required to frame a Policy for Preservation of Documents ("Policy") classifying documents in to two categories:

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

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. Emcure Pharmaceuticals Limited (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.

2. Applicability:

This Policy is applicable to all documents maintained in physical and 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.

3. Documents:

For the purpose of this Policy, the term "Documents" shall mean papers, notes, agreements, notices, summons, advertisement, agreements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers or any other record as required to be maintained and preserved by the Company in either physical or electronic form under the Companies Act, 1956 / Companies Act, 2013, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996 or any other law, as may be applicable.

4. Documents to be preserved permanently:

A. The Companies Act, 2013:

- *Original signed and stamped Memorandum and Articles of Association, as amended from time to time;*
- *Certificates of incorporation;*

- *Register of Directors and Key Managerial Persons and the securities held by them;*
- *Register of investments not held in its own name by the Company, if any;*
- *Register of contracts or arrangements in which the directors of the Company are interested;*
- *Register of Charges;*
- *Registers of renewed and duplicate share certificates, as applicable;*
- *Register of inter-corporate loans and investments;*
- *Intellectual property rights owned and related documents including, but not limited to copyrights, trademarks, patents, and industrial designs;*
- *Minutes of the Board, Committees of the Board and General meetings including Postal Ballots;*
- *Resolutions passed by circulation;*
- *Various forms and returns filed required under applicable laws;*
- *Audited Financial Statements; and*
- *Foreign register of members, if any;*

B. The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- *Listing Agreement executed with the Exchanges;*
- *Trading approval relating to listing of securities; and*
- *Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.*

C. The Depositories Act, 1996:

- *Confirmation of all Corporate Actions in respect of allotment of securities; and*
- *Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.*

5. Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other any Act or rules, for a longer duration:

A. The Companies Act 1956 / Companies Act, 2013:

- *Register of Buy-back of Securities from the date of completion of buy-back;*
- *Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots;*
- *Register of Debentures and Debenture Trust Deed from the date of its redemption;*
- *Books of Accounts including vouchers and bills;*

- Annual Returns together with the Annexures;
- Register of Transfer and Transmission of shares / Debentures and other securities;
- Disclosure of interest received from the directors of the Company in the manner prescribed;
- Attendance registers, notices, notes on agenda and other related papers of general meetings, board meetings and various committee meetings;
- Instrument creating a charge or modifying a charge, if any, from the date of satisfaction of respective charge;
- Register of deposits accepted or renewed, if any;
- Scrutinizer's Report on Postal Ballot and General Meeting;
- Documents relating to appointment of Managerial Personnel; and
- Dividend reconciliation statement till the time the dividend is transferred to IEPF.

B. The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- All reports filed with the stock exchanges from time to time;
- All disclosure of various events and Press Releases; and
- Intimations of Board Meetings.

C. Documents filed with Stock Exchanges under SEBI Regulations:

- All disclosures and intimations filed under:
 - i. SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
 - ii. SEBI (Prohibition of Insider Trading) Regulations, 2015.
 - iii. All disclosures and intimations filed under the SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 and the SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines, 1999.

6. Review of Policy:

This Policy shall be reviewed by the Board as may be deemed necessary and in accordance with any statutory /regulatory requirements. In case of any change/amendment in applicable statutes/regulations, the Policy shall stand revised to the extend thereto.

Sr. No.	Version No.	Date of Approval
1.	Ver. 1 – Adoption of the Policy	December 15, 2023