

BIOCON LIMITED POLICY DOCUMENT

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

Policy Title:	Policy for Preservation and Archival of Documents		
Scope:	Applicable to Biocon Limited and its subsidiaries (termed as Biocon or Company in the policy), except Biocon Biologics Limited and Syngene International Limited (including their subsidiaries)		
Policy Version No:	1.5	Policy Effective Date:	01-12-15 for initial version 10-11-23 for this version
Policy Next Review Date:	On or before 10-11-25	Policy Implementation Date:	01 -12 -2015
Policy Revision & Approval Authority:	Chief Financial Officer Board of Directors		

Policy details:

1. Background & Objective

Documents and records of the Company are crucial for business continuity and must be adequately retained. The Securities and Exchange Board of India (SEBI), (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) mandates listed entities to formulate a policy for preservation and archival of documents*, which is approved by its Board of Directors (termed as Board in this document) and publish the same on their website. Accordingly, Policy for Preservation and Archival of Documents (Policy) is framed and implemented.

This Policy is intended to guide the Company and its personnel** on creation, classification, maintenance, preservation, and disposal of any documents. Purpose of this policy is to have a binding framework for the preservation of documents of the Company, as approved by the Board, which shall classify them into at least two of the following categories:

- Documents whose preservation shall be permanent in nature
- Documents with preservation period of not less than eight (8) years or specific period (as per relevant statutory/regulatory requirements) after completion of the relevant transaction

Type of documents maintained as well as their retention period has been detailed in the Annexure. While prescribing different time periods for preservation of documents, the following aspects have been duly considered:

- Compliance with regulatory/statutory requirements
- Requirements with reference to any international standards (e.g., ISO)

* Documents can interchangeably be referred to as records in this document

** The term personnel cover employees, interns, trainees, apprentices, consultants, and contract workforce

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2. Governance

- Changes to this policy shall be reviewed by the Chief Financial Officer and approved by the Board of Directors
- Any non-compliance to this policy may have significant consequences and will be dealt according to Biocon's Code of Conduct and other relevant policies

3. Responsibility

Responsibility to maintain documents in a safe manner and a decision to destroy the documents after the retention period lies with the respective Department Head.

4. Maintenance of Documents

- Documents include all records, whether in paper or in electronic form#, including - but not limited to - Memorandum/Articles of Association, SOPs, Quality records, lab records, manufacturing records, training records, e-mails, inter-office memos, contracts, Board presentations, minutes of meetings, registers, licenses, approvals from authorities, strategic plans, invoices, registers, agreements, notices, statutory disclosures, orders, audio/video recordings or any other record required under/or in order to comply with requirements of any applicable law or regulation etc. or generated as part of operations of the Company
Electronic form means data stored in any contemporaneous electronic device such as computer, removable data storage device, space on cloud storage, or any other form of storage and retrieval device, whether the same is in the possession or control of the Company
- The Company shall maintain the documents either in physical or electronic mode. Relevant provisions of respective statutes/regulations shall be adhered to, while maintaining the documents. Documents shall be maintained in the prescribed formats, if any, as amended from time to time under various statutes, regulations, or internal company policy
- If the documents are maintained physically, those shall be maintained at the Company premises or with an authorized third-party service provider. If the documents are physically stored at a third-party service provider location, this transaction must be governed by a valid contract between both parties. Relevant safeguards should be in place for the protection of these documents from perils such as water, fire etc.
- Electronic version(s) of documents are to be maintained in line with the Information Security policies
- The Company shall preserve all documents as indicated in the Policy:
 - » In the event of any conflict between the provisions of this policy and any applicable statutory/regulatory requirements (e.g., Companies Act, SEBI regulations, regulatory guidelines, etc.), the latter shall prevail

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- » The Company respects personal data. Statutes/regulations define the maintenance/ period of retention of personal data which is legitimately collected by the Company. Accordingly, notwithstanding the requirements of this policy, personal data shall be retained in accordance with the requirements of applicable statutes/regulations
- Broadly, there are two kinds of documents:
 - » **Temporary/Duplicate records** including all documents that are **a)** intended to be superseded by a final or permanent record, **b)** used only for a limited period, **c)** draft or duplicate in nature. Destruction of such documents as a normal administrative practice shall be followed in these cases
 - » **Retained records** include all documents other than temporary/ duplicate records. Company has identified the preservation requirements of such documents which are maintained by multiple departments and the same has been outlined in **Annexure**
- **Access to physical documents:** Physical documents shall be maintained in a manner that prevents unauthorized access to their contents. Responsibility of ensuring adequate physical access controls lies with respective Department Heads. If the documents are stored with a third-party service provider, a periodic audit of the service-provider's premises shall be performed by the respective departments
- **Safety measures for physical documents:** Responsibility of the physical safety of documents (e.g., perils from fire, water, etc) lies with EHS team along with respective Department Heads
- **Access to electronic documents:** Electronic documents can be maintained either on network storage, or in removable media or in cloud. Appropriate access controls shall be put in place by IT and Department Heads to prevent unauthorized access to the data. Data stored in the network storage shall be adequately backed up as per the IT policy of the Company. Prior to the storage of data in a cloud managed by a service-provider, a risk assessment, as per the IT policy of the Company, shall be performed and the arrangement shall be governed by a valid contract between both parties

5. Disposal of Documents

- After expiry of the statutory/regulatory retention period, the documents may be destroyed in an orderly prescribed manner:
 - » Physical documents, after the retention period, shall be disposed using a shredder or similar methods, such that it leaves no possibility for reconstruction of the documents and information contained therein. Non-confidential paper documents can be recycled
 - » Electronic documents (including documents maintained on the cloud) shall be disposed in line with the Company's Information Security policy, which includes purging, media destruction, disk degaussing, multiple data overwrite, etc., such that it leaves no possibility for the reconstruction of the documents and information contained therein. Tapes shall be destroyed by magnetic tape shredders before disposal

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- If the documents are maintained with a third-party service provider, those shall be destroyed only upon approval from the Department Head and a confirmation shall be obtained from the service-provider indicating that the documents have been destroyed in line with the requirements of Company policy. These documents shall be destroyed only in the presence of a representative from the Company

6. Hold on document destruction or deletion

- If personnel have reasons to believe, or the Company informs the personnel concerned, that Company documents are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the personnel must preserve those until Legal or respective department determines that the documents are no longer needed. This exception supersedes any previously or subsequently established retention schedule for those documents.
- Concerns or any non-compliance noted regarding this policy should be addressed to co.secretary@biocon.com or integrity@biocon.com

7. Version history

Version	Date	Changes	Prepared by	Approved by
1.3	1-12-2015	Initial draft	Corporate Secretarial	Board of Directors
1.4	14-09-2021	Revised draft	Risk Team	Board of Directors
1.5	15-09-2023	Format change, Annexure update	Risk Team	Board of Directors

Annexure

Records to be preserved as per Companies Act or SEBI Listing or other Statutory Acts

Record type	Retention Period
Certificate of Incorporation	Permanent
Memorandum of Association and Articles of Association	Permanent
Register of members along with index, record of beneficial owners and other statutory registers as required to be maintained under the Companies Act, 2013 or any other Act's or Regulations	Permanent

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Minute books of General meetings / Postal ballot The minutes books of the Board and committee meetings	Permanent
Any other documents as may be required to be maintained under the Companies Act, 2013 or any other Acts and Regulations for the time being in force	For the periods stipulated under the respective Acts
Licences, Permits, Industrial, and other statutory approvals	Permanent
FEMA/ RBI related documents and filings	Permanent
Bylaws, Charters, and Amendments	Permanent (current version with revision history)
Policies and Procedures	Permanent (current version with revision history)
Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto and Stock Exchange filings	8 years from the date of transaction
Attendance register, notices, agenda, notes to agenda and other related papers of general meetings, board meetings and various committee meetings	8 years
Register of charges and the instrument creating a charge or modification thereon	8 years
Registers of deposits	8 years
Disclosures by a Director	8 years
Register and Index of Debenture holders	8 years after the redemption of debentures

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Structure Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 after completion of the relevant transactions and in the event of receipt of any information from any regulator regarding any investigation or enforcement proceedings	8 years after completion of the relevant transactions or completion of investigation or enforcement proceedings, whichever is later
Other registers and documents which are required to be maintained as per any statutory requirement (as prescribed in the Companies Act 2013 or any other Act's or Regulations)	8 years
Preservation and safe custody of all books and documents relating to the issue of share certificates, including the blank forms of share certificates	For 30 years and in case of disputed cases, permanently
All certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters	3 years from the date of surrender
Disclosures made under Chapter III of SEBI (Prohibition of Insider Trading) Regulations, 2015	5 years