

BIOCON	Document Retention and Archival Policy	Version. No : 1.2 Prepared by : Corporate Secretarial Reviewed by : Approved by : Effective Date : 1st December 2015 Date of Amendment : 24th January 2018
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Biocon Document Retention and Archival Policy

Contents

I. Introduction	2
II. Objective of the Policy	2
III. Preservation of Documents.....	2
IV. Mode of maintenance	4
V. Disposal and destruction of records.....	4
VI. Review and amendment	5
VII. Scope and limitation	5

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I. Introduction

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations came into force from December 1, 2015. The Listing Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Document Retention and Archival Policy (“Policy”) is being framed and implemented.

Accordingly, Biocon (hereinafter referred to as ‘the Company’, which comprises of Biocon group companies except Syngene), has formulated and notified this Policy for retention and preservation / archival of documents in compliance with the Listing Regulations.,

II. Objective of the Policy

The objective of the Policy is to classify the documents, records and registers (whether maintained in hard copy or soft copy format) of the Company which are required:

- a. Retention of records for the periods required by applicable laws and regulations.
- b. Retention of records necessary for analytical and business reasons for a period of time that will reasonably assure their availability when needed.
- c. Preservation of the confidentiality and security of records.
- d. Systematic and nonselective disposition of records not necessary for legal or business or regulatory reasons.

III. Preservation of Documents

The Company shall preserve all its documents as per the requirements of Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, Listing Regulations, company quality policy and any other laws, rules and regulations as may be applicable to the Company from time-to-time.

(i) Documents which are required to be maintained permanently:

The Company shall maintain the following documents on permanent basis:

- a. The original signed and stamped Memorandum and Articles of Association of the Company.

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---------------	---	---

- b. Minutes of General Meetings, Board Meetings and other various Committee meetings.
- c. Register of Members along with Index.
- d. Foreign Register of Members, if any
- e. Register of loans, guarantee, security and acquisitions made by the Company.
- f. Register of investments not held in its own name by the Company, if any
- g. Register of contracts with related party and contracts and Bodies etc. in which directors are interested.
- h. Register of Charges
- i. Register of renewed and duplicate share certificates.
- j. Register of Directors and KMP.
- k. Intellectual Property documents shall include, and shall not be limited to Copyrights, Trademarks, Patents and Industrial Designs. Intellectual Property Rights documents owned by the Company shall be retained by the Company permanently.
- l. Documents which are required to be maintained by the company perpetually as per the Quality Policy and / or regulatory or statutory requirements as applicable to various other teams.
- m. Regulatory documents submitted with the Regulatory Agencies and the Registration certificates.

(ii) Documents which are required to be maintained for at least 8 financial years:

- a. Books of Accounts together with the vouchers relevant to any entry in such books of accounts
- b. Register of debenture holders or any other securities issued by the Company.
- c. Copies of all Annual Returns
- d. Disclosure of interest received from Directors in the manner prescribed.
- e. Attendance Registers, Notices, Agenda, Notes on agenda and other related papers of General Meetings, Board meetings and other Committee meetings
- f. Instrument creating a charge or modifying a charge
- g. Register of deposits accepted or renewed, if any
- h. Changes to the Memorandum and Articles of Association, if any
- i. Tax records – tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final order has been received with respect to any matter, which was preferred for appeal, as the case may be
- j. Employment/personnel records in case of employees of the Company
- k. Relevant marketing and sales documents

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- l. Press releases
- m. Legal documents including, but not limited to contracts, legal opinions, pleadings, orders passed by any court or tribunal, judgements, interim orders, documents relating to cases pending in any court or tribunal or any authority empowered to give a decision on any matter, Award, documents relating to property matters.

(iii) Documents which are required to be maintained for any other definite period of time:

- a. Documents which are required to be maintained by the company for any other definite period as per the Quality Policy and / or as per regulatory or statutory requirements as applicable to various other teams.

IV. Mode of maintenance

The Company shall maintain these documents either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic / physical maintenance of records shall be adhered to.

All the records shall be maintained in the prescribed formats, if any, as amended from time to time under various laws, rules and regulations or quality policy.

If the documents are maintained physically, those shall be maintained at the company premises or at a third party authorized service provider.

Access to Physical Files

Physical files shall be maintained in a manner that prevents unauthorized individuals from gaining access to their contents.

Retention & Access to Electronic Files

Electronic records are maintained either on network storage, such as SAN or NAS, or in Magnetic media, such as TAPE or CD/DVD, with appropriate access protection and media control.

V. Disposal and destruction of records

After the expiry of the statutory/ regulatory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

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This applies to both physical and electronic documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete/destroy/sanitize electronically stored data in line with Information Security Policy of the company.

If the documents are maintained with third party authorized service provider, the documents shall be destroyed only upon approval from the concerned Department / BU Head.

VI. Review and amendment

The Board of Directors (“Board”) may review, decide additional records to be preserved for a longer period of time by suitably amending this policy from time to time, subject to applicable laws.

VII. Scope and limitation

In the event of any conflict in the provisions of this Policy and the SEBI(Listing Obligations and Disclosure Requirement) Regulations, 2015/Companies Act, 2013 or any statutory/ regulatory enactments and rules thereof, the provisions of SEBI(Listing Obligations and Disclosure Requirement) Regulations, 2015/Companies Act, 2013 or any statutory / regulatory enactments and rules thereof shall prevail over this Policy.