

GLENMARK LIFE SCIENCES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the “Board”) of Glenmark Life Sciences 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”). 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).

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. The instant policy has restricted itself to the determination of preservation timelines in respect of the Documents filed from time to time under the provisions of the Listing Regulations.

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.

4. 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.

5. 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.

6. Amendment

Any change in the Policy shall be approved by the Board of the Company or any committee of the Board or any person, as may be authorised by the Board. The Board 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

Documents whose preservation shall be permanent:

The following Documents shall be preserved on permanent basis:

Sl. No.	Name of the Document	Regulation Reference
a)	Shareholding Pattern	31 (1) (b)
b)	Quarterly Financial Results	33 (3) (a)
c)	Annual Financial Results	33 (3) (d)
d)	Annual Report	34 (1)
e)	Shareholding Pattern in case of Capital Restructuring	31 (1) (c)
f)	Voting Results by Shareholders	44 (3)
g)	Draft Scheme of Arrangement	37 (2)
h)	Yearly Disclosure of shareholding of Promoters	30 (2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

Preservation of Documents for 8 years:

The following Documents shall be preserved for 8 years:

Sl. No.	Name of the Document	Regulation Reference
a	Statement under Grievance Redressal Mechanism	13(3)
b	Corporate Governance Report	27(2)(a)

c	Statement of deviation or variation in use of issue proceeds	32(1)
d	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	7(3)
e	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	40(10)
f	Listing Fees	14
g	Intimation of appointment of Share Transfer Agent	7(5)
h	In-principle approval prior to issue of securities	28(1)
i	Prior Intimations of Board Meeting for financial Result	29(1)(a)
j	Prior Intimations of Board Meeting for Buyback, voluntary delisting etc	29(1)(b), 29(1)(c), 29(1)(d), 29(1)(e) and 29(1)(f)
k	Prior Intimations of Board Meeting for alteration in nature of securities	29(3)
l	Disclosure of Price Sensitive Information	30(6)
m	Shareholding Pattern prior to listing of securities	31(1)(a)
n	Record date or Date of closure of transfer books	42(2)
o	Record date for declaring dividend and /or cash bonus	42(3)
p	Change in name of listed entity	45(3)
q	Disclosure of information or events	30
r	Reconciliation of Share Capital Audit Report	76 of SEBI (Depositories and Participants) Regulations, 2018
s	Disclosures under Code of Internal Procedures and Conduct For regulating, monitoring and reporting of trading By Designated Persons.	10 (1)

Preservation of Documents:

The Documents specified above shall be kept in electronic mode.

APPENDIX – B

Sr. No.	Particulars of Documents destroyed	Date and mode of destruction with the initials