

## **POLICY ON PRESERVATION OF DOCUMENTS**

### **1. Scope:**

A policy on preservation of Documents would ensure safekeeping of the records and documents, while at the same time avoiding superfluous inventory of Documents. The Company (Avon Lifesciences Ltd.), therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation of the Documents .

### **2. –Definitions:**

“Applicable Law” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013 and all the rules, provisions and regulations made there under.

“Authorized Person” means the WTD, Chief Financial Officer, General Manager (Finance & Accounts), HR Manager or senior person in HR department and/or any other person duly authorized by the Board.

“Board” means the Board of directors of the Company or its Committee.

“Company” means Avon Lifesciences Ltd.

### **3. Classification:**

The preservation of Documents shall be done in the following manner:

- (a) documents whose preservation shall be permanent in nature;
- (b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

An indicative list of the Documents and the timeframe of their preservation is provided in **Annexure I**.

#### **4. Modes of preservation:**

4.1 The Documents may be preserved in

- a. physical form or
- b. Electronic Form.

4.2 The Authorized Person is expected to observe the compliance of requirements of Applicable Law.

4.3 The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

4.4. The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

#### **5. Custody of the Documents:**

Subject to the Applicable Law, the custody of the Documents shall be with the Authorized Person. Where the Authorized Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorize such other person as it may deem fit as the Authorized Person.

#### **6. Authority for approval of Policy:**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

#### **7. Authority to make alterations to the Policy:**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

**Annexure I**  
**Indicative List:**

**(A) Documents to be preserved in Perpetuity**

<b>Type of Record</b>	<b>Description</b>
<b>Board / Committee Minutes</b>	Minutes of the meeting of Board of Directors and its Committee.
<b>(i) Press Releases / Public Filings</b>	Copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any documents a member of the public can theoretically produce against that Company.
<b>(ii) Registers and other documents under Companies Act, 2013</b>	<b>Registers and other documents as specified in the Companies Act, 2013 or any amendments made to them from time to time.</b>
	Memorandum & Articles of Association of the Company
	Minutes book of general meeting, Board meetings and Committee meetings
	Register of Charges
	Register of Index of members
	Register of renewed and duplicate certificates
	Register of contracts in which directors are interested
	Register of Directors, Managing Director, Manager and Secretary
	Register of documents executed under common seal
	Register of records and documents destroyed
	Register of Investment in Securities not held in the Name of the Company

**(B) Documents with specified Retention period**

<b>Type of Record</b>	<b>Description</b>	<b>Period of Retention</b>
<b>(a) Board / Committee Meeting records</b>	A clean copy of all materials of Board / Committee should be maintained.	Eight years

<b>(b) Tax Records</b>	Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, bank statements, business costs, accounting procedures and other documents concerning the Company's revenues.	Eight Accounting years immediately preceding the current Accounting Year
<b>(c) Contracts / Agreements</b>	Final, execution copies of all contracts entered into by the Company should be retained.	Eight years from the date of contract / agreement or three years beyond the life of last transaction in the contract / agreement whichever is later.
<b>(d) Employee records</b>	Employee Personal Records, Contracts, Service Records	Three years after the cessation of employment .
<b>(e) Registers and other documents under Companies Act, 2013</b>	The Company shall maintain following registers and other documents as specified in the Companies Act, 2013 or any amendments made to them from time to time.	
	Register of Postal Ballot	8 years
	Register and Index of Debenture Holder	8 years
	Foreign Register of Members or Debenture holders	8 years
	Register of Employee Stock Options	8 years
	Forms/Register in respect of SEBI (Prohibition of Insider Trading ) Regulations 2015	8 years
	Forms/Register in respect of SEBI (substantial acquisition of shares and takeovers) Regulations, 1997	8 years
	Annual Return	8 years
	Register of Deposits	8 years
	Register of allotment	8 years
	Register of payment of dividend	8 years

Register of Directors attendance	8 years
Register of Proxies	8 years
Register of Inspection	8 years
Register of investor complaints	8 years
Register of Sweat Equity Shares	8 years
Books of Accounts	8 accounting years immediately preceding the current accounting year
Register of Buy Back of Securities	Minimum 8 years
Directors should give notice of securities of the Company held acquired or disposed of by them	8 years
Every Company should from the date of its registration maintain one or more registers of inter corporate loans and investments in securities and enter therein the particulars of every investment or loan made, guarantee given or security provided by the Company relation to any Body Corporate	8 years after expiry of investment
Register of Investments (other than securities not held in the name of the Company)	8 years after expiry of investment
All IPO records / Rights / Follow on FPO etc.	8 years after the event.
Register of transfer of shares	8 years
Register of Transmission of shares	8 years
Register of Transfer of Debentures	8 years
Register of Transmission of Debentures	8 years

All the records / documents referred above from (A) and (B) may be kept in electronic mode.

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