

SANOFI CONSUMER HEALTHCARE INDIA LIMITED

POLICY ON RETENTION OF CONTENT AND ARCHIVAL ON THE WEBSITE OF THE COMPANY

INTRODUCTION:

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates listed entities to formulate a Policy for Preservation of Documents.

This policy identifies documents/ records that need to be maintained and contain guidelines for how long certain documents should be kept and how they should be destroyed.

DEFINITIONS:

In this Policy, unless the context otherwise requires: -

“**The Board**” means the Board of Directors of the Sanofi Consumer Healthcare India Limited.

“**SCHIL**” means Sanofi Consumer Healthcare India Limited.

“**Documents**” or “**Records**” mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.

“**Electronic Record**” means the electronic record as defined under clause (t) of sub-section (1) of Section 2 of the Information Technology Act, 2000.

“**Listing Regulations**” means Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Words and expressions used in this Policy but not defined shall have the same meaning as assigned to it under the Listing Regulations and subsequent amendments and modifications thereto.

LEGAL FRAMEWORK:

- Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows:

(i) Documents whose preservation shall be permanent in nature;

(ii) Documents with preservation period of not less than eight years after completion of the relevant transactions

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

- Regulation 30(8) of Listing Regulations, provides that the listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

EFFECTIVE DATE

The Policy is effective from June 17, 2024.

PURPOSE OF THE POLICY: -

The purpose is to present a policy statement for the Company regarding preservation of its documents in accordance with all the statutory and regulatory provisions applicable to the Company including the Companies Act, 2013 and Listing Regulations. Further, the purpose of this Policy is to ensure that 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.

SCOPE:

These guidelines will be valid for determining the preservation period for commercial, Human resource, Information Technology and legal records and will be applicable to all locations of the Company.

RESPONSIBILITY:

The respective Functional Heads shall be responsible to maintain the records and authorised to destroy the record by following this policy.

POLICY STATEMENT :

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

- Certain Documents shall be preserved permanently, as required by applicable laws.
- Certain Documents shall be preserved for a period of not less than 8 years, as required by applicable laws.
- Where there is a period lesser than 8 years for which a Document is required to be preserved as per applicable laws, for such shorter period as required under applicable laws.
- In case of any other Document, for such period as may be decided by the respective Functional Heads after the completion of relevant transaction / event, taking a considered view about its relevance.
- The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
- The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED:

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Listing Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

- Documents shall be classified in the following categories:
 - (i) Mandatory to be preserved under governing laws
 - (ii) Non-Mandatory to be preserved
- Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
- All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

Notwithstanding the above, the Management shall have the discretion to host any of such documents on the website of the Company for such additional period as the management may deem fit on a case-to-case basis.

DISPOSAL OF DOCUMENTS AND RECORDS

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways without the prior written approval of any one of the key managerial personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law: -

- Recycle non-confidential paper record
- Shred or otherwise render unreadable confidential paper records; or
- Delete or destroy electronically stored data.

REVIEW & AMENDMENT

- The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Board has the right to alter, modify, add, delete or amend any of the provisions of this policy at its discretion.
- In case of any amendment(s), clarification(s), circular(s), etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.
