

POLICY FOR PRESERVATION OF DOCUMENTS

VARUN BEVERAGES LIMITED

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“SEBI (LODR)”], the provisions of other applicable laws, Rules and Regulations made thereunder, requires every listed company to form a policy for preservation of its documents, approved by its Board of Directors, classifying them in at least two categories as follows:

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

The Company may keep documents specified in clauses (a) and (b) above in physical / electronic mode.

1. GOVERNING LAWS

This policy shall be governed by the provisions of the Companies Act 2013, SEBI Act & Rules and Regulations made thereunder, Secretarial Standards issued by the Institute of Company Secretaries of India, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

2. PURPOSE

This Policy deals with the preservation of the corporate records of **Varun Beverages Limited** (hereinafter, referred to as “the Company”). It seeks to ensure that the Company’s business is adequately documented and is managed in accordance with best practices. This Policy emphasizes on the importance of preservation of the records and disclosures hosted on the website of the Company for making information accessible to all stakeholders for taking well-informed decisions. It also aims at promoting transparency, accountability and relationship with stakeholders.

All employees are expected to fully comply with this policy.

3. SCOPE

This policy is applicable to all units/ departments of the Company.

4. EFFECTIVE DATE

The Policy is effective from 28th March, 2016.

5. DEFINITIONS

Archives means and is referred to as a repository where the records are kept.

Electronic records means the records communicated and maintained by means of electronic equipment.

Electronic Form means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company.

Record means a database of disclosed information or events in any format or medium that has been created by or for the Company or received by the Company in connection with the transaction of the organization's affairs and operations.

Maintenance means keeping Documents, either physically or in Electronic Form.

Preservation means to keep in good order and to prevent from being altered, damaged or destroyed.

The words and phrases used in this policy which are not defined here, shall derive their meaning from the Applicable Law.

6. CLASSIFICATION OF DOCUMENTS

Based upon the recommendations of the management, the Board of Directors have classified that the documents will be retained and preserved as tabulated hereunder:

Sl. No.	Particulars	Annexure
1.	Documents that needs to be preserved/retained permanently	Annexure 1
2	Documents that may be preserved/retained for a period of 08 years or more after the end of the financial year	Annexure 2

The documents concerning other routine matters and having substantial long-lasting consequences shall be preserved by all the concerned persons /Regional Heads / Finance Head/ CFO and/or the Departmental Heads of the Company depending upon usefulness and necessity.

7. MODE OF PRESERVATION, AUTHORITY & RESPONSIBILITY

Documents may be preserved in physical form or electronic form as per various statutory requirements and are subject to the same degree of confidentiality and care. The preservation of documents should be of such manner so as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

Regional Heads and other department heads of the Company shall be responsible for preservation of the documents in their respective region/department taking into account this policy prescribing the minimum period for preservation of documents and shall take decision to retain/preserve or destroy documents pertaining to their region/department keeping in view the ongoing or anticipated litigation(s), if any.

8. DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed by the respective department on yearly basis and action shall be taken to destroy those records which are due for disposal.

9. REVIEW / AMENDMENT

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments. The Board of Directors can amend this Policy, as and when deemed

fit. 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.

Annexure 1

Documents whose preservation shall be permanent in nature

S. No	Nature of Document(s)
01	Registration and Incorporation Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of the meetings of General Body, Board and its various committees
06	Material Agreements/Contracts
07	Orders issued by Courts/Statutory bodies
08	Investment Documents/proofs including certificates etc.
09	Any other document as may be required to be maintained permanently in terms of applicable law(s), maintained and preserved from time to time

Annexure 2

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

S. No	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Personnel Documents
04	Insurance Policies/ Claims under various policies
05	Correspondences with Departments/shareholders
06	Non-Statutory Registers/Documents
07	Any records or documents connected with legal proceedings save and except records or documents of proceedings which the management has appropriately decided not to maintain
08	Any other document as may be required to be maintained in terms of applicable law(s), maintained and preserved from time to time.