

PADMALAYA TELEFILMS LIMITED

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POLICY ON PRESERVATION OF THE DOCUMENTS

Board Evaluation Policy on preservation of Documents

To ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents.

This document supersedes any Policy on preservation of the Documents in the Company and should be read in conjunction with the most recent policies/code and procedures documented and held on file.

Base Document: Regulation 9 of the Securities Exchange Board of India (Listing obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”).

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1. Scope

A Policy on preservation of Documents (defined below) would ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, 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 to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. Definitions

2.1 **"Act"** means the Companies Act, 2013.

2.2 **"Applicable Law"** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

2.3 **"Authorized Person"** means any person duly authorized by the Board.

2.4 **"Board"** means the Board of directors of the Company or its Committee.

2.5 **"Company"** means Padmalaya Telefilms Limited

2.6 **"Current Document(s)"** means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

2.7 **"Document(s)"** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

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

2.9 **"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 or otherwise the Company has control over access to it.

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

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

2.12 “Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. Coverage

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

4. Classification of Documents

- 1 Documents shall be classified in the following categories
 - a) Mandatory under governing laws
 - b) Non-Mandatory
- 2 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.
- 3 All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- 4 Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

5. Modes of Preservation of Documents / records

Subject to clause 4 above, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

- a. Tax & Accounting Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.
- b. Employment Records/Personnel Records:** Labour laws require the Company to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company

should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

6. Custody of the Documents

All documents shall be under the custody of respective head of the departments as detailed below:

Sl. No.	Documents	Authorised Persons
1	Tax / Accounting Records	CFO /Official in charge of financial records
2	Financial Statements / Minutes / Statutory Registers, Lease Documents / Contracts	Company Secretary & Compliance Officer
3	Employment / personal Records:	VP (HRD)
4	Legal Documents and Intellectual Property and Trade Secrets	Legal Advisor
5	Electronic Mails	Individual respective sections

7. 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.

8. 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.

9. Destruction of Documents

- a. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in Annexure - II.
- c. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
- d. The entries in the register shall be authenticated by the Authorized Person.

The format of the register has to be in accordance with Annexure-III.

10. Conversion of the form in which the Documents are preserved

- a. The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- b. This will be done after obtaining prior approval of the Board.

11. Authenticity

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

12. Interpretation

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this Policy is changed to conform to the law, rule, Regulation or standard.

Annexure – I

Indicative list

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
The Companies Act, 2013	
<ul style="list-style-type: none">• The memorandum and articles of the company• Affidavit from the subscribers to the memorandum and from persons named as the first directors• Register of members• Books and Documents relating to the issue of share certificates, including the blank forms of share certificates• Annual return• The foreign register of members Register of charges• Minutes book of general meeting	<ul style="list-style-type: none">• Register of charges (8 years)• Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar).• Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)• All notices pertaining to disclosure of interest of directors• All certificates surrendered to a company (3 years from date of surrender)• Register of deposits (not less than 8 years from the date of last entry)• Instrument creating a charge or modification (8 years from date of satisfaction of charge)

Secretarial Standard

<ul style="list-style-type: none"> Minutes of Board meeting (SS-1) 	<ul style="list-style-type: none"> Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2) Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 10 years or as long as they remain current).
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Annexure- II

The following categories of Documents may be destroyed as normal administrative practice:

- catalogues;
- Copies of press cuttings, press statements or publicity material;
- Letters of appreciation or sympathy, or anonymous letters;
- Requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
- Facsimiles where a photocopy has been made;
- Telephone message;
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy) ; and
- Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy).

Annexure- III

The format of the register of Documents disposed/destroyed:

PARTICULARS OF DOCUMENTALONGWITHPROVISION OF APPLICABLELAW	DATE AND MODE OFDESTRUCTION	INITIALS OF THE AUTHORISED PERSON
