

DOCUMENT PRESERVATION & ARCHIVAL POLICY

RAJ TELEVISION NETWORK LIMITED

DOCUMENT PRESERVATION & ARCHIVAL POLICY



1. PREAMBLE & OBJECTIVE

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, ('Listing Regulations'), every listed company is required to have a policy for preservation of documents. As per Regulation 30 of the Listing Regulations, all information disclosed to stock exchange(s) by a listed company is required to be hosted on its website for a minimum period of five years and thereafter as provided in its archival policy.

Additionally, there are various statutes including corporate laws, securities laws, tax laws, labour laws etc., which may require Raj Television Network Limited ("Raj TV" or 'Company') to preserve specified documents either permanently or up to a prescribed time period. Accordingly, the Board of Directors ('Board') of the Company has adopted this policy i.e., Preservation of Documents and Archival Policy ('Policy') to ensure that the statutory records and documents are preserved as per the requirements prescribed under the various statutes applicable to the Company.

2. SCOPE

This policy shall govern the procedure of preservation of all documents and records maintained by the Company in physical form or electronically as required to be maintained under statutory and regulatory requirements viz., the Companies Act 2013, and rules issued thereunder, the secretarial standards, and any other applicable regulations under the Security Exchange Board of India Act 1992 and amendments thereto (hereinafter referred as "Act/Regulations") and various other statutes as applicable on the Company from time to time.

3. TERMS AND DEFINITIONS

A. In this Policy unless the context otherwise requires:

'Documents' means papers, notes, agreements, advertisements, requisitions, letters, orders, declarations, correspondence, summons, notices, requisitions, orders, forms, registers, minutes or any other record, including any modifications or amendments thereof, if any, whether issued, sent or kept as per the requirements of the applicable law for the time being in force or otherwise, maintained on paper or in electronic form.

'Preservation' means preventing the Documents from being tampered, damaged, altered or destroyed.

B. Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Act or the SEBI (LODR) Regulations, 2015, as may be amended from time to time, shall have the meaning respectively assigned to them therein.

4. POLICY STATEMENT ON PRESERVATION OF DOCUMENTS

The Company has classified Preservation of Documents in the following manner:

- A. Documents to be preserved permanently: The documents listed in Schedule I along with any other documents required legally shall be maintained and preserved permanently by the Company.
- B. Documents to be preserved for no less than eight (8) years: The documents listed in Schedule II along with any other documents required legally shall be maintained and preserved for no less than eight (8) years by the Company.
- C. Documents to be preserved for no less than three (3) years: All communications to the Board and committees of the Board with regard to calling of meetings.

Records may be preserved for longer periods of time where required under any other Applicable Laws. Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise. This Policy will be reviewed periodically by the senior management and amendments may be made, subject to approval of the Board, if and when required. The senior management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

The document retention shall also take into account the requirements for business continuity plan (BCP) in place from time to time.

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5. LIMITATIONS, REVIEW AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the applicable law, the provisions of applicable law shall prevail over this Policy. Any subsequent amendment/ modification to the applicable law shall automatically apply to this Policy.

The Board may review and amend this Policy from time to time, as may be deemed necessary.

Schedule I: Documents whose preservation shall be permanent in nature

- Incorporation documents;
- Memorandum and articles of association;
- Register of members along with the index;
- Register of charges;
- Statutory Registers;
- Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, creditors, committees of the Board of Directors and resolutions passed by circulation;
- License, registrations, permissions, approvals etc. received from any government or regulatory authorities;
- Title deeds, agreements, of properties;
- Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any
 court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal
 or any other Authority empowered to give a decision on any matter, Awards, Documents relating to
 property matters;
- Intellectual property Documents;
- All other documents which are required to be preserved permanently in accordance with the provisions of the applicable laws.

Schedule II: Documents with preservation period of not less than eight years after completion of relevant transaction

- Books of account including relevant books and papers and financial statements;
- Disclosures/ notices by a director of his interest;
- Register of deposits;
- Instrument creating a charge or modification;
- Annual return and copies of all certificates and documents required to be annexed thereto;
- The attendance register of Board & Committee Meetings;
- All other Documents which are required to be preserved for not less than 8 years in accordance with the provisions of applicable law.

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