



**POLICY ON PRESERVATION &
ARCHIVAL OF DOCUMENTS
(Regulation 9 of SEBI Listing
Regulations, 2015)**

Policy on Preservation and Archival of Documents

1. LEGAL FRAMEWORK

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposes certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to regulation 9 is to formulate and put in place a policy for preservation of documents.

The Company is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

2. PURPOSE AND SCOPE

The purpose of this document is to present a high level policy statement for Picturehouse Media Limited (the Company) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

The policy is intended to define the Company’s preservation of documents and to provide guidance to the executives and staff working in the Company in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of the Company to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

This policy has been adopted and approved by the Board of Directors at its meeting held on February 9, 2016 and effective forthwith.

3. DEFINITIONS

- (i) “Board” means the Board of Directors of the Company.
- (ii) “Company” means Picturehouse Media Limited.
- (iii) “Documents” means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

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- (iv) "Listing Regulations" or "LODR" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

Pursuant to The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Board of Directors have classified the following documents to be retained and preserved for posterity.

- Documents that need to be preserved / retained permanently
- Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI LODR,2015
- Documents to be preserved electronically and archived when necessary.

Provided further that the company may keep the documents as specified above in electronic mode.

5. PROVISION WITH REGARD TO PRESERVATION OF DOCUMENTS UNDER VARIOUS LAWS

The Company from time to time establishes retention or destruction of policies or documents or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. 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.

- (i) **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.
- (ii) **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.

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- Employment and personnel records shall be preserved for a minimum period of five years irrespective of whether such employee continues to be employed with the Company or not.
- Individual employee files need to be maintained as long as the concerned individual remains an employee of the Company has also for a minimum period of 5 years thereafter or such period of time as prescribed under respective laws for time being in force.
- Returns under various labour laws, governmental and statutory filings etc. need to be retained for a period of 8 years or in accordance with the related statute as may be specified therein.

(iii) Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities:

Record Category	Record Type	Retention Period
Board meeting & Committee meeting records	<ol style="list-style-type: none"> 1. Agenda 2. Internal Audit Reports 3. Board Minutes 4. Committee Minutes 5. Adopted policies/codes 6. Attendance Registers 	Permanent
General Meeting records	<ol style="list-style-type: none"> 1. Minutes 2. Register of Members 3. Attendance register 	Permanent
Other Secretarial Records	<ol style="list-style-type: none"> 1. Corporate Records (certificate of incorporation, commencement of business) 2. MOA & AOA 3. Common Seal 4. Annual Reports 5. Statutory Registers pursuant to Companies Act, 2013 and/or Companies Act, 1956 	Permanent
	<ol style="list-style-type: none"> 6. Non-statutory Registers pursuant to Companies Act, 2013 and/or Companies Act, 1956 	8 years from the Financial year in which the last entry is made
	<ol style="list-style-type: none"> 7. Correspondences with Shareholders 	Atleast 8 years
	<ol style="list-style-type: none"> 8. Copies of all Annual Returns 	Atleast 8 years
Miscellaneous	ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing

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- (iv) **Press Releases/Public Filings:** The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities for a period of 8 years.
- (v) **Legal Files / documents:** All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently. Documents like leases, Leave & License agreements and other agreements shall be preserved for at least 5 years beyond the life of the said documents.
- (vi) **Development/Intellectual Property and Trade Secrets:** Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:
- (a) Derives independent economic value from the secrecy of the information; and
 - (b) The Company has taken affirmative steps to keep the information confidential.

The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.

- (vii) **Contracts:** Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least five years beyond the life of the agreement, and longer in the case of publicly filed contracts.
- (viii) **Electronic Mail:** E-mail that needs to be saved should be either:
- (a) Printed in hard copy and kept in the appropriate file; or
 - (b) Downloaded to a computer file and kept electronically or on disk as a separate file so as to ensure its timely retrieval.

The retention period depends upon the subject matter of the e-mail, as covered elsewhere in this policy.

(ix) Electronic Documents including email retention and back up

- (a) Electronic Mail : Not all email needs to be retained, depending on the subject matters
- All e-mail – from internal and external sources to be deleted after 12 months.
 - Staff will strive to keep all but an insignificant minority of their email related to business issues.
 - IT team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.
 - Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers.
 - Staff will take care not to send confidential / proprietary information to outside sources.

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- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.
- (b) Electronic Documents including PDF files.
- PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
 - Text/ Formatted files: All word / excel / Power point files may be deleted once every year depending on the importance or lack of it.
- (c) Web page files
- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
 - May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

6. DISCLOSURES

This Policy will be disclosed on the Company's website at www.pvpcinema.com.

7. AMENDMENTS TO THE POLICY

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time. 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.