

## **PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY**

### **I. PREAMBLE**

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) require every Listed Company to formulate a policy on preservation of Documents. Accordingly, the following policy is being framed by the Board of Directors (“Board”) of Paramount Communications Limited with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

### **II. OBJECTIVE**

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

- (i) to be preserved permanently and
- (ii) to be preserved for a period not less than 8 years.

### **III. DEFINITIONS**

- i. “Document(s)” refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.
- ii. “Electronic Record(s)” means the electronic record as defined under Section 2 of Information Technology Act, 2000.
- iii. “Electronic Form” means on any 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.
- iv. “Maintenance” means keeping Documents either physically or in electronic form.
- v. “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

### **IV. PRESERVATION OF DOCUMENTS**

The company shall preserve all the documents as per the requirements and provisions of the Companies Act, 2013 and the rules made there under, the Secretarial Standards, the Listing Regulations, standard operating procedure of the Company in this regard, if any and any other law, rules, regulations as may be applicable to the Company from time to time.

Documents which are to be maintained permanently:

The Company shall maintain the following documents on a permanent basis:

- (i) Memorandum of Association and the Articles of Association of the Company
- (ii) Minutes of General Meetings, Board Meetings and various Committee Meetings
- (iii) Register of Members along with Index
- (iv) Register of loans, guarantee, security and acquisition made by the company
- (v) Register of investments not held in its own name by the company, if any
- (vi) Register of contracts with related party and contracts and Bodies etc. in which directors are Interested
- (vii) Register of Charges
- (viii) Registers of Renewed and duplicate share certificate
- (ix) Register of directors and KMP
- (x) Registers of Debenture holders (including Foreign Registers of Debentures) or Register for any other Securities issued by the Company
- (xi) Intellectual Property Documents including Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently

Documents which are to be maintained for at least eight financial years:

- (i) Books of accounts together with the vouchers relevant to any entry in such books of accounts
- (ii) Copies of Annual Returns
- (iii) Disclosure of Interest received from the Directors of the Company in the manner prescribed
- (iv) Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- (v) Instrument creating a Charge or modifying a Charge, if any
- (vi) Changes to the Memorandum of Association and the Articles of Association, if any
- (vii) Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns etc.
- (viii) Employment /Personnel Record in case of employees of the Company
- (ix) Relevant marketing and sales documents
- (x) Press Releases
- (xi) Legal documents

Archival of Documents on Website:

Documents that are to be made available on the Company's website in compliance with the Listing Regulations shall be made available on the website for 5 years and thereafter shall be archived for a period of 3 years.

**V. MODE OF MAINTENANCE**

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to: All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under the various rules and regulations.

**VI. DISPOSAL AND DESTRUCTION OF RECORDS**

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

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

**VII. ASSESSMENT AND AMENDMENT IN POLICY**

The Company shall review this Policy periodically, in accordance with Applicable Laws, and may issue revised Policy in respect of the subject matter from time to time.

**VIII. QUERIES AND CLARIFICATIONS**

Any queries or clarifications in relation to this Policy may be addressed to the Company Secretary of the Company.

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