



## PRIME FOCUS LIMITED

### POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

#### PREFACE

The Board of Directors (**the “Board”**) of Prime Focus Limited (**the “Company”**) has adopted the following policy with regard to preservation and archival of Documents. Regulation 9 of the Securities Exchange Board of India (**“SEBI”**) (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires the Company to frame a policy on preservation of documents. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosures.

In compliance to the aforesaid regulation, this policy is formulated to define a process for preservation of documents and to further develop a guideline for archival of such documents including those which are maintained in the electronic form and are disclosed on the website of the Company. In other words, the Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the timeframe prescribed in various Regulations

#### PURPOSE OF THE POLICY

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process for subsequent archival of such records.

#### DEFINITIONS

**“Applicable Law”** means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed.

**“Archive/archiving”** is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.

**“Board”** in relation to the Company, means the collective body of the directors of the Company.

**“Company”** means Prime Focus Limited.

**“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 accessible to the Company.

**“Regulations”** mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.



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“**Records / Documents**” includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law.

“**Policy**” means this Policy on Preservation of documents and Archival Policy and as may be amended from time to time.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Regulations or any other applicable law or regulation to the extent applicable to the Company.

### **TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION**

The company shall maintain and preserve documents as specified hereunder:

#### **Category (A):**

The documents of permanent nature (listed in **Annexure-1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

#### **Category (B):**

The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure-2**) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

1. ‘books and papers’ as defined in clause 12 of section 2 of the Companies Act, 2013;
2. ‘books of accounts’ as defined in clause 13 of section 2 of the Companies Act,2013;
3. ‘documents’ as defined in clause 36 of section 2 of the Companies Act,2013;
4. ‘register of company’ as defined in clause 74 of section 2 of the Companies Act,2013

Further, the company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

Notwithstanding anything contained in this policy in case of dispute with tax authorities or government authorities, records and documents relating to dispute will be preserved till the settlement of dispute or eight years whichever is later.



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### **PRESERVATION PRINCIPLES**

1. The Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under Regulation 30 of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a period of five years from the date of disclosure to the Stock Exchanges. For ensuring safety of the data hosted on the website of the Company, a back-up of the website shall be taken atleast on a regular intervals.
2. After five years, such disclosures shall be removed from the Company's website and preserved in a secured server of the Company. Such disclosures shall be preserved in a logical manner viz. as per nature/date of the disclosure, etc. to facilitate easy retrieval as and when required. The disclosures shall be preserved in a non-editable format which do not require permanent preservation but require years of preservation as prescribed under Applicable Law on the server of the Company.
3. Physical preservations shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorised.

### **AMENDMENT**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

### **COMMUNICATION**

Copy of this policy duly approved shall be placed before the Board and circulated among all the Director of the Company. This policy as amended from time to time shall be made available at the website of the Company.

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**Annexure 1:**

**Documents whose preservation shall be permanent in nature:**

<b>Sr. No.</b>	<b>Nature of Document(s)</b>
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Register of Members
4	Index of Members
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Any other document as may be required to maintain 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:**

<b>Sr. No.</b>	<b>Nature of Document(s)</b>
1	Books of Accounts
2	Annual Return(s)
3	Register of Debenture holders
4	Index of Debenture holders
5	Statutory Registers
6	Tax related records and documents
7	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time