

T. V. Today Network Limited

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POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015)]

Clause 1- Policy Statement

The Company is committed to establish the framework needed for the effective records management of the Company. This policy provides standards for classifying, managing and storing those records. The Company has a substantial volume of records relating to its research, staff, finances and other activities. In order to efficiently conduct its business, the storage, retrieval and management of these information reserves is a significant issue. A good record keeping program is fundamental to the Company's commitment to administrative transparency and accountability. It enables the Company to account for decisions and actions by providing essential evidence in the form of records and ensures the preservation of the collective memory of the Company.

Therefore, this policy seeks to ensure that the Company's business is adequately documented through the creation of records that are then managed in accordance with best practice.

Clause 2- Definitions:

Records: A "record" is a database of disclosed information or events in any format or medium that has been created by or for the Company, or received by the Company in connection with the transaction of the organization's affairs and operations.

Record Keeping: Record Keeping is the act or process of making and maintaining complete, accurate and reliable evidence of business transactions.

Appraisal: The process of evaluating business activities to determine which records need to be captured and how long the records need to be kept, to meet business needs, the requirements of organizational accountability and community expectations.

Clause 3- Rationale of the Policy

This Policy emphasizes on the significance of preservation of the records, as the Corporate Records of the Company are its most important assets and it is pertinent for the company to manage the records in a consistent and logical manner.

Rationale for framing this policy is underlined below:

- ***Legal Requirement:*** Law requires the Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could expose the Company to penalties and fines.
- ***Fulfilling Business Needs:*** The Company may access to such stored information as and when the need arise which will enable them to take well informed and analyzed decisions.
- ***Potential Evidence:*** Proper maintenance of records, serves as a prima facie evidence in a lawsuit.

Clause 4- Scope

This policy is applicable to all areas and locations of the Company. It is intended to comply with relevant legislation in all states and territories in which the Company has a presence.

It should be aware that electronic documents have the same status as paper documents. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Therefore electronic records must be managed as part of a comprehensive record keeping program.

Clause 4- Underlying Policy

Retention of various factors may be as follows:

1. **Documents filed with Stock Exchanges:** Any document filed with the Stock Exchanges shall be preserved atleast for a period of 8 years and thereafter, depending upon the materiality of the document, the Compliance Officer may determine the time period of preservation.

2. Board and Board Committee Material:

- Proceedings of the meeting of the Board and Committee are required to be stored permanently in the form of minute book.

3. Press Releases/Public Filings:

- All the press releases that the Company have made should be retained permanent copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any document that a member of the public can able to produce against that Company.

4. Documents pertaining to the relevant transactions:

- Hard copies of the documents relating to any material event/ transaction shall be preserved for a period of not less than 8years from the date of occurrence or happening of the event/ transaction as the case may be and thereafter the company may depending upon the materiality of an event/transaction may maintain its documents in electronic form.

5. Legal Records:

- Legal counsel should be consulted to determine the retention period of particular documents, depending upon the nature of the case.

6. Other documents as per applicable statutes:

- The Company may preserve documents/information furnished under other applicable statutes either for a period prescribed under such statutes or such other period as the Compliance Officer may deem fit.

Clause 5: Storage

Records should be stored in conditions that are clean and secure, with low risk of damage from fire, water, dampness, mould, insects and rodents. They should also be kept away from direct sunlight and other sources of light and heat. The storage area should be well ventilated and ideally maintained at a stable temperature and humidity. Records in non-paper formats such as photographs, maps or computer disks require specialized storage conditions and handling process that take account of their specific

physical and chemical properties. Irrespective of format, records of continuing value require higher quality storage and handling to preserve them for as long as that value exists.

Clause 6- Risk Based Approach

The Company adopts a risk-based approach in an endeavor to preserve the collection of records of the Company. A preservation risk assessment for the whole collection shall be conducted and subsequently shall be reviewed periodically. The result of the risk assessment would be used to determine the urgency of preservation action: a low risk may simply indicate that the risk assessment should be recalculated at a future date, whereas a high risk will trigger immediate action. Accordingly, any of the following preservation action can be opted:

- (a) dispose of the information if it is of no relevance; or
- (b) get it stored for a specific period of time either depending upon the requirement of applicable statute or if the document have long-term retention value then it can be preserved permanently.

Clause 7- Effective date and Policy Enforcement

The Policy shall be effective from 1st day of December, 2015.

Clause 8- Review

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.