

## CREATIVE INTRA LIMITED

### **ARCHIVAL/DOCUMENTS PRESERVATION POLICY**

*(Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)*

**(As approved by the Board on 12.10.2015)**

#### **I. Introduction**

In the current world of communication, information which flows through various modes plays a pivotal role. Information constitutes one of the most valuable assets of an organization. In an urge to develop and maintain a complete information management strategy, the policy on archiving of Documents (this "Policy") plays a vital role in completing the Information Management Life Cycle of a company.

The major purpose of this Policy is to establish a systematic basis for archiving which will result in cost-effective, efficient and reliable archive management within the organization.

#### **II. Definitions in relation to this Policy**

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

**"Appraisal"** is the process by which records are evaluated to determine whether they should be retained or destroyed, based on legal requirement and set of principles.

**"Archive/archiving"** is the process of transferring/maintaining records systematically (electronic/physical) by storing, appraising, conserving and authorizing access to the said 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 Creative Intra Limited.

**"Designated official"** means an officer of the Company entrusted with the responsibility of administering this Policy and implementing reasonable processes and procedures concerning archival of Records or Documents.

**"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.

“Officer” includes any director, manager or key managerial personnel or any other person authorized by the Board of Directors.

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

### III. Objectives

The major focus of this Policy is to create archives which provide the evidence required for carrying out daily activities and keeping track of transactions entered into by the Company. The following are the key objectives of this Policy:-

1. To capture and store all relevant Records and Documents.
2. To ensure security and verified access to all relevant Records and Documents.
3. To preserve the Documents or Records for legal, administrative and historical purposes. To dispose the Records or Documents in accordance with the authorized retention and disposal schedule.
4. To ensure back-up and allow for continuity in the event of a disaster.
5. To comply with all regulatory and other legal requirements.

Thus, this Policy aims at ensuring creation and management of authentic, reliable and usable archives for accountability purposes and for preservation of the Company’s collective memory.

### IV. Archival methodology

The Company’s archival records are those records which are no longer current but have been chosen or classified as “to be preserved for a specified length of time” for compliance with law. The records are classified into the following categories:

***The Records that are eligible to become archives may need to be kept permanently because they constitute evidence. Documents which do not require permanent preservation but require years of preservation as prescribed under Applicable Law.***

The Archives might consist of all the Documents prescribed or maintained as per the Preservation of Documents Policy of the Company and other Documents which are of relevance to the Company in general. An archival record may be the only copy that exists anywhere. Archival records be maintained in physical/Electronic Form or both.

#### Physical records

Paper and other records are filed appropriately in the filing system as physical files which are under the control of designated officials. All physical archives are stored in the Head Office and

in each of the Company's Regional Offices or Area Offices, Plants, Management Development Centre, Training & Development Centre and in any other locations. The archives are maintained / stored in a well secured area with restricted access.

### **Electronic records**

Archival of electronic documents shall be systematic and the Official shall be responsible for the operation and maintenance of archives in electronic format with restricted access.

### **V. Statutory Compliance / Disclosure**

The Company will ensure dissemination of all information as required under the Policy of Disclosure of Material Events or information.

The Company will ensure displaying of the information in its official website, under the appropriate classification.

The Company will also ensure that the disclosures that are made on its website will be available for downloading or viewing for a minimum period of five years.

Further, the Company will ensure that all disclosures made by the Company that are required to be communicated to the shareholders are disseminated on its website.

### **VI. Monitoring and Review**

This Policy will be regularly monitored and reviewed to ensure that it remains relevant to the Company's business aims and requirements. Compliance with this Policy and associated procedures will be monitored on an ongoing basis through self-assessment procedures and reviews. The continuous monitoring ensures that:

- No illegal records disposal takes place.
- There is a timely review of procedures to ensure that they, the procedures, are relevant, useful and meet the statutory needs.
- Unauthorized access to records is averted.

### **VII. Amendment**

The Board has the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, subject, however, to the condition that such alterations will be in consonance with the provisions of the Applicable Law.

## **VIII. Disclaimer**

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any Applicable Law governing the Company, such Applicable Law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.