

SUNGOLD MEDIA AND ENTERTAINMENT LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

SUNGOLD MEDIA AND ENTERTAINMENT LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents. The Board of Directors of Sungold Media And Entertainment Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

2. SCOPE

To establish and define an efficient process in the Company for preservation of Documents or Records (including but not limited to notes, registers, minutes, communications, title-proofs, agreements, deeds, contracts, orders, permissions and declarations in paper or electronic form), which are required to meet regulatory, financial, legal and other business requirements in order to protect the interests of the Company and its stakeholders, in a manner easily retrievable, and to develop guidelines for archival, safe disposal and destruction of any of the Documents which may be in physical or electronic form.

This Policy shall primarily apply to Documents or Records maintained by the Company in compliance with the requirement of Listing Regulations, applicable SEBI Regulations and/or Companies Act, 2013 (hereinafter referred to as ‘Applicable Statutes’). However, the Company may extend the scope of the Documents Preservation Policy from time to time, based on business and other requirements.

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

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

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

SUNGOLD MEDIA AND ENTERTAINMENT LIMITED

B. The documents to be maintained and preserved for a 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 years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

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

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

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

SUNGOLD MEDIA AND ENTERTAINMENT LIMITED

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

SUNGOLD MEDIA AND ENTERTAINMENT LIMITED

Annexure 1

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

S. No	Nature of Document(s)
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Investment Documents/proofs including certificates etc.
11.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

SUNGOLD MEDIA AND ENTERTAINMENT LIMITED

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

S. No	Nature of Document(s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondences with Departments/shareholders
6.	Non-Statutory Registers/Documents
7.	Films, Videos, CDs, DVDs, tapes etc.
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.
