

## **Document Retention & Archival Policy**

This policy deals with the retention and archival of the corporate records of **Cyber Media (India) Limited** and all its subsidiaries (hereafter, the “Company”). This policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Corporate records are all paper or electronic records that are produced by the Company and its employees, including but not limited to, memoranda, contracts, e-mails, time sheets, effort estimates and expense records.

The Company is required to maintain certain types of corporate records for a specified period of time. Failure to do so could subject the Company and its employees to serious legal consequences.

All employees are expected to fully comply with this policy.

Generally, all corporate records (whether electronic or paper) of the Company are to be retained for no less than three (3) years, and may be destroyed thereafter.

Additionally, there are certain types of records that need to be retained for a longer period of time, as identified below.

- a) Board of Directors Records: Minutes of meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for not less than three (3) years.
- b) Press Releases & Public Filings: All publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for no less than five (5) years on the website of the company.
- c) Books of Accounts and Tax Records: Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.
- d) Employment Records: The Company maintains personnel records that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment. These records should be retained for a period of three (3) years following the cessation of employment.
- e) Intellectual Property Records: Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property right.

- f) Contracts: Execution copies of all contracts entered into by the Company should be retained for at least three (3) years following the expiry or termination of the contracts.

For all official communications, all employees must use their CyberMedia email ids. The Company retains all rights to access, maintain and store such emails.

In the event of major incident, the first priority of the Company is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

Email backups must be maintained on the external mail server and must be archived for atleast eight years.

Employees must take adequate steps to back-up their own data. If an employee believes that certain records are very important, they should take a printout and file it in relevant files.

The syslog and server data is required to be backed up by the IT department of the company for a period of three years.

If an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise.

This policy should be reviewed periodically by the Senior Management and amendments effected to subject, to approval of the Board, if and when practical difficulties are encountered. The senior management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.