

# RICH UNIVERSE NETWORK LIMITED

Regd. Office: 7/125, (C-2), 2<sup>nd</sup> FLOOR, SWAROOP NAGAR, KANPUR – 208002

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## POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

### 1. SCOPE AND OBJECTIVE:

This Policy on Preservation and Archival of Documents (“Policy”) is framed in accordance with Regulation 9 and Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and applicable provisions of the Companies Act, 2013.

The Objective of this Policy is to ensure:

- Systematic identification, classification, maintenance, and preservation of documents;
- Protection of records from damage, loss, or unauthorized access;
- Compliance with statutory and regulatory requirements; and
- Timely archival and disposal of documents.

### 2. DEFINITIONS:

For the purpose of this Policy:

- “**Act**” means the Companies Act, 2013 and rules made thereunder.
- “**Applicable Law**” means all applicable laws, statutes, rules, regulations, circulars, and guidelines.
- “**Board**” means the Board of Directors of the Company.
- “**Document(s)**” includes all records, files, papers, agreements, registers, returns, forms, books, or any other material in physical or electronic form.
- “**Authorized Person**” means any person authorized by the Board or the Company Secretary/Compliance Officer.
- “**Compliance Officer**” shall have the meaning assigned under SEBI Regulations.

### 3. COVERAGE:

This Policy applies to all documents maintained by the Company in physical and/or electronic form and provides guidance on their preservation, maintenance, and disposal.

### 4. CLASSIFICATION AND RETENTION OF DOCUMENTS:

The Documents of the Company shall be maintained and preserved in the following manner:

#### a) **Documents maintained under Applicable Law:**

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Documents required to be preserved under any applicable law, rules, or regulations shall be retained for the period prescribed therein.

## b) Documents where no specific period is prescribed:

In cases where no retention period has been specified under any applicable law, such documents shall be preserved for such duration as may be considered necessary by the Authorized Person based on their nature and relevance. Ordinarily, such documents may be retained for a period of eight (8) years from the date of creation.

## 5. MODES OF PRESERVATION:

The documents and records of the Company may be maintained and preserved in physical form or electronic form, as may be considered appropriate by the Company from time to time.

The Authorized Person responsible for preservation of documents shall ensure compliance with the applicable legal and regulatory requirements relating to maintenance, storage and safekeeping of records.

The documents shall be preserved in a manner that safeguards them against unauthorized access, alteration, tampering, damage or destruction and ensures their integrity, authenticity, accessibility and availability whenever required.

## 6. ARCHIVAL OF DOCUMENTS (WEBSITE DISCLOSURES):

6.1 The Company shall host all disclosures made to stock exchanges on its website for a minimum period of five years, in compliance with Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6.2 Thereafter, such disclosures shall be archived for such period as may be decided by the Company in accordance with Applicable Law.

6.3 Archived disclosures shall be:

- Properly indexed and retrievable; and
- Made available upon request, subject to confidentiality and legal requirements.

6.4 The Compliance Officer shall be responsible for ensuring compliance with this archival requirement.

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## **7. CUSTODY OF THE DOCUMENTS:**

7.1 The documents and records of the Company shall remain under the control and supervision of the Authorized Person or such other person as may be designated by the management from time to time.

7.2 In the event of transfer, resignation or change in responsibility of such person, all relevant records, files, data, access details and other related materials shall be properly handed over to the concerned successor or to any person authorised by the Company for this purpose.

## **8. DESTRUCTION OF DOCUMENTS:**

8.1 Documents and records which are no longer required and whose retention period has expired may be disposed of or destroyed in accordance with the applicable laws and internal requirements of the Company. This shall apply to both physical and electronic records.

8.2 The destruction or disposal of documents shall be carried out by the Authorized Person after obtaining such approvals, if any, as may be required under the applicable laws or by the management of the Company.

8.3 The Company may maintain a register or record of documents destroyed or disposed of, containing brief particulars of the documents, date of destruction and mode adopted for such destruction. Such record shall be authenticated by the Authorized Person.

## **9. CONVERSION OF DOCUMENTS:**

Physical documents may be converted into electronic form for efficient record management, subject to:

- Accuracy and completeness;
- Proper authorization; and
- Compliance with Applicable Law.

## **10. AUTHENTICITY OF DOCUMENTS:**

In cases where documents are preserved in both physical and electronic modes, the physical copy shall ordinarily be treated as the original record, unless otherwise provided under the applicable laws or regulations.

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## **11. INTERPRETATION:**

In the event of any inconsistency between the provisions of this Policy and the applicable laws, rules, regulations or statutory requirements, the provisions of such applicable laws and regulations shall prevail. The Policy shall be interpreted and implemented in accordance with the applicable legal framework as amended from time to time.

## **12. REVIEW AND AMENDMENTS:**

The Board of Directors or any Committee authorized by the Board may review, revise or modify this Policy from time to time, as may be considered necessary, to ensure alignment with the applicable laws, regulatory requirements, and corporate governance standards.

## **13. EFFECTIVE DATE:**

This Policy shall be effective from the date of its approval by the Board of Directors of the Company.