

KHYATI MULTIMEDIA ENTERTAINMENT LIMITED
COMPANY CIN NO: L92199GJ1995PLC024284

Regd.Office: 100, Chinubhai Towers, Opp: Handloom House, Ashram Road,
Navrangpura, Ahmedabad: 380 009.

Telephone: 91-079-26582983 (F) 91-079-26584335

E.Mail: khyatimulti@yahoo.com ~ Website : www.khyatimultimedia.com

POLICY ON

“PRESERVATION OF THE DOCUMENTS”

POLICY ON PRESERVATION OF THE DOCUMENTS

Board Evaluation Policy on Preservation of Documents

To ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents.

This document supersedes any Policy on preservation of the Documents in the Company and should be read in conjunction with the most recent policies/code and procedures documented and held on file.

Base Document: Regulation 9 of the Securities Exchange Board of India (Listing obligations and Disclosure Requirements) Regulations, 2015 ("Regulations").

Contents:

| Sl. No. | Particular | Page No. |
|---------|---|----------|
| 1. | Scope | 3 |
| 2. | Definitions | 3 |
| 3. | Coverage | 4 |
| 4. | Classification | 4 |
| 5. | Modes of preservation | 4 |
| 6. | Custody of the Documents | 5 |
| 7. | Authority for approval of Policy | 5 |
| 8. | Authority to make alterations to the Policy | 5 |
| 9. | Destruction of Documents | 5 |
| 10. | Conversion of the form in which the Documents are preserved | 5 |
| 11. | Authenticity | 6 |
| 12. | Interpretation | 6 |
| | Annexure – I | 7 |
| | Annexure- II | 8 |
| | Annexure- III | 8 |

POLICY ON PRESERVATION OF THE DOCUMENTS

1. Scope

A Policy on preservation of Documents (defined below) would ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this Policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. Definitions

- 2.1 "Act" means the Companies Act, 2013.
- 2.2 "Applicable Law" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- 2.3 "Authorized Person" means any person duly authorized by the Board.
- 2.4 "Board" means the Board of directors of the Company or its Committee.
- 2.5 "Company" means Intense Technologies Limited
- 2.6 "Current Document(s)" means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- 2.7 "Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
- 2.8 "Electronic Record(s)" means the electronic record as defined under clause (t) of sub - section (1) of section 2 of the Information Technology Act, 2000.
- 2.9 "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 the Company has control over access to it.
- 2.10 "Maintenance" means keeping Documents, either physically or in Electronic Form.
- 2.11 "Preservation" means to keep in good order and to prevent from being altered, damaged or

POLICY ON PRESERVATION OF THE DOCUMENTS

destroyed.

2.12 "Regulations" means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. Coverage

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

4. Classification of Documents

1 Documents shall be classified in the following categories

a) Mandatory under governing laws

b) Non-Mandatory

2 Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

3 All records and documents as provided herein shall be preserved for such time and period as may be provided herein.

4 Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

POLICY ON PRESERVATION OF THE DOCUMENTS

5. Modes of Preservation of Documents / records

Subject to clause 4 above, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

- a. **Tax & Accounting Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.
- b. **Employment Records/Personnel Records:** Labour laws require the Company to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

6. Custody of the Documents

All documents shall be under the custody of respective head of the departments as detailed below:

| Sl. No. | Documents | Authorised Persons |
|---------|---|---|
| 1 | Tax / Accounting Records | Accounts Manager /Official in charge of financial records |
| 2 | Financial Statements / Minutes / Statutory Registers, Lease Documents / Contracts | Company Secretary & Compliance Officer |
| 3 | Employment / personal Records: | General Manager (HRD) |
| 4 | Legal Documents and Intellectual Property and Trade Secrets | Legal Advisor |
| 5 | Electronic Mails | Individual respective sections |

7. Authority for approval of Policy

The Board shall have the authority for approval of this Policy in pursuance to the Regulations. This authority has been granted via the Regulations.

POLICY ON PRESERVATION OF THE DOCUMENTS

8. Authority to make alterations to the Policy

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

9. Destruction of Documents

- a. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in Annexure - II.
- c. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
- d. The entries in the register shall be authenticated by the Authorized Person.

The format of the register has to be in accordance with
Annexure-III.

10. Conversion of the form in which the Documents are preserved

- a. The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- b. This will be done after obtaining prior approval of the Board.

11. Authenticity

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

POLICY ON PRESERVATION OF THE DOCUMENTS

12. Interpretation

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this Policy is changed to conform to the law, rule, Regulation or standard.

Annexure - I

Indicative list

| PERMANENT PRESERVATION | TEMPORARY PRESERVATION |
|--|---|
| The Companies Act, 2013 | |
| <ul style="list-style-type: none"> • The memorandum and articles of the company • Affidavit from the subscribers to the memorandum and from persons named as the first directors • Register of members • Books and Documents relating to the issue of share certificates, including the blank forms of share certificates • Annual return • The foreign register of members Register of charges • Minutes book of general meeting | <ul style="list-style-type: none"> • Register of charges (8 years) • Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities) • Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar). • Foreign register of debenture holders or any other security holders (8 years from the date of Redemption) • All notices pertaining to disclosure of interest of directors • All certificates surrendered to a company (3 years from date of surrender) • Register of deposits (not less than 8 years from the date of last entry) • Instrument creating a charge or modification (8 years from date of satisfaction of charge) |
| Secretarial Standard | |
| <ul style="list-style-type: none"> • Minutes of Board meeting (SS-1) | <ul style="list-style-type: none"> • Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2) • Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 10 years or as long as they remain current). |

POLICY ON PRESERVATION OF THE DOCUMENTS

Annexure II

The following categories of Documents may be destroyed as normal administrative practice:

- catalogues;
- Copies of press cuttings, press statements or publicity material;
- Letters of appreciation or sympathy, or anonymous letters;
- Requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
- Facsimiles where a photocopy has been made;
- Telephone message;
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy) ; and
- Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy).

Annexure III

The format of the register of Documents disposed/destroyed:

| PARTICULARS OF DOCUMENTALONGWITHPROVISION OF APPLICABLELAW | DATE AND MODE OFDESTRUCTION | INITIALS OF THE AUTHORISED PERSON |
|--|-----------------------------|-----------------------------------|
| | | |
| | | |

For KHYATI MULTIMEDIA ENTERTAINMENT LIMITED

**(KARTIK J .PATEL)
MANAGING DIRECTOR**

KHYATI MULTIMEDIA ENTERTAINMENT LIMITED
COMPANY CIN NO: L92199GJ1995PLC024284

Regd.Office: 100, Chinubhai Towers, Opp: Handloom House, Ashram Road,
Navrangpura, Ahmedabad: 380 009.

Telephone: 91-079-26582983 (F) 91-079-26584335

E.Mail: khyatimulti@yahoo.com ~ Website : www.khyatimultimedia.com

ARCHIVAL POLICY

Archiving of Documents which are hosted on the Company's website

Recognizing the need to ensure the preservation and availability of the Documents of the Company after their required regulatory preservation period, for any legal, administrative, and historical purposes, the Company adopts the following archival policy in respect of Documents which are hosted on the website of the Company:

1.1. All Documents generated, disclosed or received by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company and constitute archival material.

1.2. Archival material of the Company shall not be destroyed or purged without the approval of the Authorized Person. Provided that nothing contained herein shall be deemed to lead to an exception in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

1.3. Material so selected for preservation shall be sent to the Company archives in the category of [Libraries]1.

1.4. The Authorized Person, in consultation with the Board, will be responsible for deciding how long archival material is to be retained in and under the direct control of the officer concerned, if the law does not specify any time period. The period shall not be less than 3 years.

1.5. With reference to the pretext, the Documents submitted to the stock exchange, to be hosted on the website for the purpose of compliance with disclosure norms shall also be archived.

a. Archiving of the Documents to be submitted to the stock exchange, in terms of the Regulations, shall be done after the lapse of the preservation period of 5 years [as specified in Regulation 30(8)], as per the archival policy.

b. For the Documents to be submitted to the stock exchange to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the specified/required time period.

For KHYATI MULTIMEDIA ENTERTAINMENT LIMITED

(KARTIK J. PATEL)

MANAGING DIRECTOR

KHYATI MULTI MEDIA ENTERTAINMENT LIMITED
COMPANY CIN NO: L92199GJ1995PLC024284

Regd.Office: 100, Chinubhai Towers, Opp: Handloom House, Ashram Road,
Navrangpura, Ahmedabad: 380 009.

Telephone: 91-079-26582983 (F) 91-079-26584335

E.Mail: khyatimulti@yahoo.com ~ Website : www.khyatimultimedia.com

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

1. OBJECTIVE

The Policy is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations).

The objective of the Policy is to determine materiality of events or information of the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

EFFECTIVE DATE

This Policy is effective December 1, 2015.

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

2. DEFINITION

“Act” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“Board of Directors” or “Board” means the Board of Directors of Blue Star Limited, as constituted from time to time.

“Company” means Intense Technologies Limited.

“Key Managerial Personnel” mean key managerial personnel as defined in sub-section (51) of section 2 of the Companies Act, 2013;

“Listing agreement” shall mean an agreement that is to be entered into between a recognised stock exchange and the Company pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements), 2015

“Material Event” or “Material Information” shall mean such event or information as set out in the Schedule or as may be determined in terms of Clause 3 of the Policy. In the Policy, the words, “material” and “materiality” shall be construed accordingly.

“Material Subsidiary” shall mean any subsidiary company of the Company which is or has been determined as a material subsidiary as per the provisions of the Regulations.

“Policy” means this Policy on criteria for determining Materiality of events or information and as may be amended from time to time.

“Regulations” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

"Schedule" means a Schedule III of (Listing Obligations and Disclosure Requirements) Regulations, 2015

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

3. GUIDELINES FOR DETERMINING MATERIALITY OF EVENTS OR INFORMATION

Events / information shall be considered as Material if it meets any of the following criteria:

- (a) the event or information is in any manner unpublished price sensitive information;
- (b) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;
- (c) the omission of an event or information is likely to result in significant market reaction if the said omission came to light at a later date; and
- (d) any other event/information which is treated as being material in the opinion of the Board of Directors of the Company.

4. DISCLOSURES OF EVENTS OR INFORMATION

- a. Events specified in Annexure A are deemed to be material events and the Company shall make disclosure to of such events or information as soon as reasonably possible and not later than twenty-four (24) hours from the occurrence of such event or information in the following manner:
 - i. inform the stock exchanges in which the securities of the Company are listed;
 - ii. upload on the corporate website of the Company.

Provided that in case the disclosure is made after twenty-four (24) hours of occurrence of such event or information, the Company shall, along with such disclosure(s) provide an explanation for delay.

- b. The Company shall make disclosure of events as specified in Annexure B based on application of guidelines for determining Materiality as per clause 3 of the Policy.
- c. The Company shall make disclosures updating Material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.
- d. The Company shall disclose all events or information with respect to its Material Subsidiaries.
- e. The Company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information and on its own initiative. Further it shall confirm or deny any event or information to stock exchange(s) reported in the media.
- f. In case where an event occurs or information is available with the Company, which has

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

not been indicated in Annexure A or Annexure B, but which may have material effect on it, the Company will make adequate disclosures in regard thereof.

All the above disclosures would be hosted on the website of the Company for a minimum period of five years and thereafter archived as per Company's policy for Preservation and Archival of Documents.

5. AUTHORITY TO KEY MANAGERIAL PERSONNEL

Mr. KARTIK J. PATEL, Managing Director of the Company shall have the authority to determine Materiality of any event or information and ensure disclosures of the same are made to stock exchange(s), subject to the provisions of this Policy.

Contact details:

Mr. Kartik J. Patel
Managing Director

Khyati Multimedia Entertainment Limited

100, Chinubhai Towers,
Opp: Handloom House, Ashram Road,
Navrangpura, Ahmedabad-380009
Tel NO: 91-079-26582983
Fax: 91-079-26584335
E-Mail: khyatimulti@yahoo.com
Website: www.khyatimultimedia.com
Corporate Identification Number (CIN):
L92199GJ1995PLC024284

6. 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 the 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.

7. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Listing Agreement; Companies Act, 2013; Regulations or any other statutory enactments, rules, the provisions of such Listing Agreement / Companies Act, 2013 or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

8. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company www.khyatimultimedia.com and address of such web link thereto shall be provided in the Annual Report of the Company.

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

Annexure: A

Events which shall be disclosed without any application of the guidelines for Materiality:

1. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/merger / demerger/restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the Company or any other restructuring;

Explanation. - 'Acquisition' shall mean, -

- (i) acquiring control, whether directly or indirectly; or,
- (ii) acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that -
 - (a) the Company holds shares or voting rights aggregating to five per cent or more of the shares or voting rights in the said company, or;
 - (b) there has been a change in holding from the last disclosure and such change exceeds two per cent of the total shareholding or voting rights in the said company.
2. Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.;
3. Revision in credit rating(s);
4. Outcome of Meetings of the Board of Directors: The Company shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following:
 - a) dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;
 - b) any cancellation of dividend with reasons thereof;
 - c) the decision on buyback of securities;
 - d) the decision with respect to fund raising proposed to be undertaken
 - e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;
 - f) reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or
 - a. securities or any other rights, privileges or benefits to subscribe to;
 - g) short particulars of any other alterations of capital, including calls;
 - h) financial results;
 - i) decision on voluntary delisting by the Company from stock exchange(s).
5. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the Company), agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof;
6. Fraud/defaults by Promoter or Key Managerial Personnel or by Company or arrest of Key

POLICY ON CRITERIA FOR DETERMINING MATERIALITY OF EVENTS

Managerial Personnel or Promoter;

7. Change in Directors, Key Managerial Personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Auditor and Compliance Officer;
8. Appointment or discontinuation of share transfer agent;
9. Corporate debt restructuring;
10. One-time settlement with a bank;
11. Reference to BIFR and winding-up petition filed by any party /creditors;
12. Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company;
13. Proceedings of Annual and extraordinary general meetings of the Company;
14. Amendments to memorandum and articles of association of Company, in brief;
15. Schedule of Analyst or institutional investor meet and presentations on financial results made.

Annexure: B

Events which shall be disclosed upon application of the guidelines for Materiality.

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
3. Capacity addition or product launch.
4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the listed entity
8. Litigation(s) / dispute(s) / regulatory action(s) with impact.
9. Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
10. Options to purchase securities including any ESOP/ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals..

For KHYATI MULTIMEDIA ENTERTAINMENT LIMITED

(KARTIK J. PATEL)

MANAGING DIRECTOR
