

WEBSITE ARCHIVAL POLICY

OF

COSMO FIRST LIMITED
(Formerly Cosmo Films Limited)

1. Purpose

The Purpose of this Policy is to establish the framework needed for effective preservation of disclosures hosted on the website of the Company required to be maintained under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”) so that Company’s historical data and records are easily accessible to shareholders, stakeholders and staff of the Company.

2. Regulatory Requirement

- 2.1 Regulation 30 of these Listing Regulations deals with disclosure of material events by the listed entity specified under Part A of Schedule III of the Listing Regulations.

Further, SEBI has issued a circular on ‘Continuous Disclosure Requirements for Listed Entities’ on September 9, 2015 indicating the details that need to be provided while disclosing above events.

- 2.2 Regulation 30 and the above circular states that:

a) the events specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be “Material Events” and the listed entity shall make disclosures of such events to the Stock Exchanges.

b) the events specified in Para B of Part A of Schedule III of the Listing Regulations are to be disclosed to the stock exchanges, if considered “Material” pursuant to the Company’s Policy on “Reporting of Material Events under Regulation 30 of Listing Regulations”.

c) the events or information with respect to material subsidiary of the Company as per Listing Regulations.

As per Regulation 30(8) of the Listing Regulations, the Company is required to disclose on its website all such events or information which is to be disclosed to the Stock Exchanges pursuant to this Regulation.

- 2.3 The disclosures made to the stock exchanges shall be hosted on the website of the Company for a minimum period of 5 (five) years and thereafter, as per the Archival Policy of the Company. This policy is to be uploaded on the website of the Company.

3. Process

The disclosures made to stock exchanges would be provided to the IT Department by the Company Secretarial Department for uploading on the website of the Company.

The information provided to IT Department would be promptly uploaded on the website of the Company and shall be hosted on the website for five years period from the date of such hosting under “Corporate Announcement” in Investors Relations section.

Thereafter, the information would be archived under the heading “Past Events/Information” and would be retained in the website for such period as may be decided by the Board.

4. Right for Modification/ Cancellation

The Policy shall be reviewed and amended with due approval from the Board of Directors, if so required, mandatory in case there are any regulatory changes requiring modifications to the Policy.

5. Exceptions/ Deviations

Any deviation required in the policy should be informed to the Company Secretary, who will be responsible for referring the same to the Board of Directors for further approvals.

6. Right to access/ retrieve

The Company Secretary and subordinates directly reporting in the Secretarial Department shall have the right of access to the Listing Records.

7. Responsibility/ Accountability

The Company Secretary shall be responsible for ensuring compliance under this Policy.

8. Amendment

8.1 Any subsequent amendment/ modification in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or applicable laws in this regard shall automatically apply to this Policy.

8.2 The Company reserves the right to amend or modify this Policy in whole or in part, at any point of time.

This document was approved by the Board of Directors at its meeting held on January 25, 2016.