

Code of Conduct Exemption Request Form

Internet Corporation for Assigned Names and Numbers ("ICANN")
12025 Waterfront Drive, Suite 300,
Los Angeles, California 90094,
Attention: New gTLD Program Staff

RE: Request for Exemption from Registry Operator Code of Conduct

T V SUNDRAM IYENGAR & SONS LIMITED ("Registry Operator"), in connection with the execution of the Registry Agreement for the **.TVS** TLD (the "Registry Agreement"), hereby requests an exemption from the obligations of the **Registry Operator Code of Conduct set forth in Specification 9 to the Registry Agreement** (the "Code of Conduct"). Pursuant to such request, Registry Operator confirms that each of the following statements is true and correct (collectively, referred to as the "Statements"):

1. All domain name registrations in the TLD are registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliate (as defined in the Registry Agreement);
2. Registry Operator does not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator; and
3. Application of the Code of Conduct to the TLD is not necessary to protect the public interest for the following reasons:

The **.TVS** TLD represents the Registry Operator's brand "TVS" and will be operated as an online platform by the Registry Operator and its Affiliates only. As explained in our Application Q18 (A), **T V SUNDRAM IYENGAR & SONS LIMITED** intends to own a TLD, as it is looking for having a complete control on the second level domain names. TVS Group overall has many group companies, various investors and partners, and numerous small businesses.

In the current situation, the group companies hold various different types of domains in current TLDs, such as '.com', '.in' and so on. This makes it difficult for one to remember the company website URL, and gives an impression of poor

branding or communication of the group, as there is no standardization within the domain names.

Although the Internet is a fast growing medium, there is widespread possible naming conventions and elements of Cybersquatting. The existing TLDs may mislead any financial institutional customers to various phishing malicious websites, leading to online fraud. TVS wants to have an exclusive ownership of a TLD (.TVS), so it can provide a complete level of security and comfort to its stakeholders, with respect to online fraud, malicious websites and the likes.

The Group would like to have complete ownership and control over the .TVS TLD, allowing it to market the TVS brand, created over the past three decades, efficiently and in a standard manner.

Accordingly, the Code of Conduct is not necessary to protect other registrants and approval of this Exemption Request will not impact third parties.

Registry Operator represents that the registration policies attached hereto as Schedule A are a true and correct copy of the Registry Operator's registration policies for the TLD. Registry Operator agrees to notify ICANN promptly in writing in the event any of the Statements has become untrue (whether before or after an exemption has been granted). Registry Operator further acknowledges and agrees that the Exemption will be void if at any time any of the Statements has become untrue.

For T V Sundram Iyengar & Sons Limited

[REDACTED]

Submitted by: [REDACTED]

Position: **CHIEF FINANCIAL OFFICER**

Date Noted: **28/07/2020**

Email: [REDACTED]

Exhibit A

TLD Registration Policies

.TVS TLD REGISTRY POLICIES

Our registry policies are designed to follow the highest of standards and meet the criteria for global operations.

1. ELEGIBILITY

.TVS will be used for TVS group of companies and its affiliates. All the domains would be available only to the Registry Operator, its Affiliates or Trademark Licensees.

2. TERM OF REGISTRATION / RENEWAL

Initial Term - In general, domains will be offered for periods of one (1) to ten (10) years, but no greater than ten years.

Renewal - The term may be extended at any time for a period of one (1) to ten (10) years provided that the total aggregate term of the Domain Name does not exceed ten (10) years at any time.

Cancellation - The Registrant may cancel a Domain Name registration at any time by submitting its request in writing with the Registrar.

3. ROLL OUT

The roll-out of our TLD is anticipated to feature the following phases:

- Reservation of reserved names,
- General Availability period — real-time registrations, made on a first-come first-served basis.
- The registration of domain names in the .TVS TLD will follow standard practices, procedures and policies, which include the following:
 - o Domain registration policies (for example, grace periods, transfer policies, etc.)
 - o This TLD will follow the ICANN standard domain lifecycle.
- When the domain is created, the standard five day Add Grace Period begins, the domain and contact information are available in WHOIS, and normal operating EPP domain statuses will apply. Other specifics regarding registration rules for an active domain include:

- The domain must be unique;
 - Restricted or reserved domains cannot be registered;
 - The domain can be registered from 1-10 years;
 - The domain can be renewed at any time for 1-10 years, but cannot exceed 10 years;
 - The domain can be explicitly deleted at any time;
 - Contacts and hosts can be modified at any time.
- Abuse prevention tools and policies, for example, measures to promote WHOIS accuracy and efforts to reduce Phishing and Pharming,
 - Rights protection mechanisms and dispute resolution mechanism policies (for example, UDRP, URS) will also be implemented as per guidelines from ICANN.
 - Other detailed policies for this domain include policies for reserved names.

4. REGISTRY RESERVED NAMES

We will reserve the following classes of domain names, which will not be made generally available to registrants via the Sunrise or subsequent periods:

- All of the reserved names required in Specification 5 of the new gTLD Registry Agreement.
- The geographic names required in Specification 5 of the new gTLD Registry Agreement.
- The registry operator's own name and variations thereof, and registry operations names (such as registry.tld, and www.tld), for internal use.
- Names related to ICANN and Internet standards bodies (iana.tld, ietf.tld, w3c.tld, etc.), for delegation of those names to the relevant organizations upon their request.
- The list of reserved names will be published publicly before the Sunrise period begins, so that registrars and potential registrants will know which names have been set aside.

5. PRIVACY AND DATA PROTECTION AND WHOIS

Privacy and confidential information protection as per the New gTLD Registry Agreement, we will make domain contact data (and other fields) freely and publicly available via a Web-based WHOIS server. This default set of fields includes the mandatory publication of registrant data. Our Registry-Registrar Agreement will require that registrants consent to this publication.

We shall notify each of our registrars regarding the purposes for which data about any identified or identifiable natural person ("Personal Data") submitted to the Registry Operator by such registrar is collected and used, and the intended recipients (or categories of recipients) of such Personal Data (the data in question is

essentially the registrant and contact data required to be published in the WHOIS). We will require each registrar to obtain the consent of each registrant in the TLD for the collection and use of such Personal Data. The policies will be posted publicly on our TLD web site. As the registry operator, we shall not use or authorize the use of Personal Data in any way that is incompatible with the notice provided to registrars.

Our privacy and data use policies are as follows:

- As registry operator, we do not plan on selling bulk WHOIS data. We will not sell contact data in any way. We will not allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations.
- DNS query data will never be sold in a way that is personally identifiable.
- We may from time to time use the demographic data collected for statistical analysis, provided that this analysis will not disclose individual Personal Data and provided that such use is compatible with the notice provided to registrars regarding the purpose and procedures for such use.

As the registry operator we shall take significant steps to protect Personal Data collected from registrars from loss, misuse, unauthorized disclosure, alteration, or destruction.

In order to acquire and maintain accreditation for our TLD, we will require registrars to adhere to certain information technology policies designed to help protect registrant data. These will include standards for access to the registry system and password management protocols.

We will allow the use of proxy and privacy services, which can protect the personal data of registrants from spammers and other parties that mine zone files and WHOIS data. We are aware that there are parties who may use privacy services to protect their free speech rights, or to avoid religious or political persecution.

6. DOMAIN NAME SUSPENSION

The Registry may suspend a Domain Name immediately at its sole discretion:

- i. To comply with applicable law, court order, government rule or under any dispute resolution processes;
- ii. in order to protect the integrity and stability of the domain name system and the Registry;
- iii. to comply with Specification 13;
- iv. as required by ICANN Consensus Policy;
- v. where such Domain Name is placed under reserved names list at any time; and
- vi. where Registrant fails to make payment to the Registrar for registration, renewal or any other relevant services.

7. COMPLIANCE WITH CONSENSUS AND TEMPORARY POLICES

As the Registry and Registrant of .TVS TLD, we would ensure that we will be bound by all applicable consensus and temporary policies as required and mandated by ICANN.