

JCT LIMITED

Policy on Preservation of Documents

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every Listed Company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

1. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

2. DEFINITIONS & EXPLANATIONS

In this policy, unless the context otherwise requires:

- i). **"Act"** means the Companies Act, 2013 and rules made there under, as amended from time to time
- ii). **"SEBI Regulations"** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- iii). **"Company"** means JCT Limited
- iv). **"Document"** includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- v). **"Key Managerial Personnel"** or "KMP" shall have the same meaning ascribed to it under the Act.
- vi). **"Board" or "Board of Directors"** shall mean the Board of Directors of JCT Limited, as may be re-constituted from time to time
- vii). **"Financial Year"** shall have the same meaning ascribed to it under the Act.
- viii). **"Electronic Form"** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

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3. PRESERVATION PERIOD

For determining the preservation period, the records are categorized into following three categories:

1.	DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE;
•	Common Seal,
•	Minutes books of Board Meetings, General Meetings and Committee Meetings,
•	Statutory Registers which needs to be maintained permanently
•	License and Permissions,
•	Statutory Forms and disclosures except for routine compliance,
•	All other documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently.
2.	TEMPORARY PRESERVATION UPTO 8 YEARS:
•	Annual Returns,
•	Board Agenda and supporting documents,
•	Attendance Register,
•	Office copies of Notice of General Meeting and related papers,
•	Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
•	All notices pertaining to disclosure of interest of directors,
•	Instrument creating a charge or modification,
•	Books of accounts, financial statements etc. and
•	Register of debenture holders or any other security holders.
•	All other documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years
3.	OTHERS:
•	As per applicable law.

4. PRESERVATION LOCATION

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department.

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5. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

6. DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed every year or according to need by the respective department and action shall be taken to destroy those records which are due for disposal. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule.

7. POLICY REVIEW:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

8. AMENDEMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.