

JYOTI STRUCTURES LIMITED



POLICY ON PRESERVATION OF DOCUMENTS

(as amended w.e.f February, 2024)

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

BACKGROUND

The Securities and Exchange Board of India (SEBI) issued the SEBI Listing Obligations and Disclosure Requirements Regulations, 2015. It came into force from December 1, 2015. These regulations mandate listed entities to formulate a policy for preservation of documents. It is in this context that the policy on preservation of documents and archival of documents is being framed and implemented.

OBJECTIVE OF THE POLICY

The objective of this policy is to classify the documents in two categories i.e. (i) Documents which need to be preserved permanently, and (ii) Documents which need to be preserved for a specific period of time.

POLICY

The corporate records are important assets. They include essentially all records, whether paper or electronic. The law requires the Company to maintain certain types of corporate records either permanently or for a specified period.

This policy will be valid for determining preservation period for the corporate records including commercial and legal records and will be applicable to all locations of the Company.

RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation, and destruction of records pertaining to the respective department.

PRESERVATION PERIOD

The preservation period starts with the conclusion of the financial year in which the document was formed or the last entry was made. The preservation period of agreements starts with the end of the financial year in which the agreement period expires.

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

Category & Description	Period of Preservation
<p>Records/documents with short reference value – i.e.</p> <p>Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.</p>	<p>Less than 8 years</p>
<p>Records/documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual/legal implications, which need to be preserved for a prescribed period per statutory requirement; and records, which need to be preserved for a particular period according to Company's own reference needs.</p>	<p>Documents to be preserved for a period of 8 to 10 years</p>
<p>Records which will have a permanent value for the Company even after the expiry of the legal preservation period.</p>	<p>Permanent</p>
<p>Records which are required for adducing evidence in judicial or quasi-judicial or other dispute redressal forums.</p>	<p>Till the time the matters are finally disposed of.</p>

Records or documents not covered in the policy, such as ordinary correspondence and normal e-mails, should not be retained for more than one year.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial, mediation and alternate dispute fora, industrial disputes, etc., are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, and approvals, etc., from Government/Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

Minute books containing minutes of the board meetings, committee meetings, general meetings of members, statutory records, and registers maintained under the Companies Act, 2013 shall be preserved permanently.

All records must be properly classified and labeled accordingly, indexed and stored in the record room, and maintained by the Company for this purpose.

PRESERVATION LOCATION

The preservation location will be the concerned department. If it is different, the document should be kept in a file for reference purposes in the respective department. In the case of critical documents which need to be preserved for very long periods or permanently, they should be stored in fireproof or other secure cabinets.

MODE OF PRESERVATION

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

DESTRUCTION OF RECORDS

The records/documents preserved, shall be reviewed every year or according to need, by the respective department and action taken to destroy those records which are due for disposal. After the statutory retention period expires, the preserved documents may be destroyed using the method approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate, unimportant or irrelevant. This applies to both physical and electronic documents.

GENERAL AUTHORISATION

The Policy shall be reviewed periodically, and any of the two—the Chief Executive

Officer, Chief Financial Officer, and the Company Secretary— shall be authorized to make such changes jointly, as may be deemed necessary or as warranted by law.

COMPLIANCE

Failure to comply with the Document Retention Policy may result in disciplinary action. Any queries or clarifications about this policy should be referred to the Office of the Company Secretary.

THE DISCLOSURES HOSTED ON THE WEBSITE

All disclosures made by the Company to the stock exchanges under Regulation 30 shall be retained on the Company's website for a period of five years from the date of hosting. Subsequently, they will be moved to the archive folder on the website for an additional one-year period.

