

**JNK INDIA LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS**

**&**

**ARCHIVAL POLICY**

**(Adopted by the Board on June 9, 2023)**

## **1. REGULATORY FRAMEWORK**

**1.1** The Policy on Preservation & Archival of Documents & Records (“**Policy**”) of JNK India Limited (“**Company**”) has been prepared and adopted in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) as amended from time to time.

**1.2** Regulation 9 of Listing Regulations requires the Board of Directors of the Company to formulate a policy for preservation of documents classified into two categories:

- i. **1.2.1** Documents whose preservation shall be permanent; and
- ii. **1.2.2** Documents to be preserved for not less than eight years (8 years) after completion of therelevant transactions.

**1.3** Regulation 30 (8) of Listing Regulations requires the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 5 (five) years from the date of its publication and thereafter, as per this Policy.

**1.4** The objective of this Policy is to determine the period for maintenance, preservation and disposal of physical and electronic documents and records of the Company.

## **2. APPLICABILITY**

This Policy is applicable to all documents maintained in physical and electronic mode by the Company.

The documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

## **3. MODE OF PRESERVATION**

The company shall keep the documents in electronic mode or physical mode and in such manner as the Board of Directors may deem fit such that the records are maintained in accordance with Listing Regulations and Companies Act, 2013 and rules and regulations made thereunder.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the documents and prohibit unauthorized access. The Company shall make appropriate provisions for back up of all documents preserved both physically and electronically.

## **4. DOCUMENTS TO BE PRESERVED PERMANENTLY**

### **A. Companies Act, 2013**

1. Memorandum and Articles of Association as amended from time to time
2. Certificate of Incorporation
3. Certificate of Commencement of Business
4. Register of Contracts

5. Register of Directors and KMPs and the securities held by them
6. Register of Loans and Investments made by the Company
7. Register of Index and Members
8. Minutes of the Board, Committees of the Board, General Meetings including meetings conducted through Postal Ballot
9. Resolutions passed by circulation
10. Various forms and returns filed with the authorities
11. Audited Financial Statements
12. Excise Returns, Income Tax Returns, Sales Tax Returns, Service Tax Returns
13. Order issued by Courts/ Statutory Bodies
14. All acquisitions and merger related papers

**B. Listing Regulations**

1. Listing Agreement executed with the Exchange
2. Trading approval relating to listing of securities
3. Offer documents for Public issue and private placement of securities filed with SEBI

**C. Depositories Act**

1. Confirmation of all Corporate Actions with respect to allotment of securities
2. Intimation on allotment of ISIN for securities issued

**D. Others**

1. Register of Records and Documents destroyed

**E. Any other documents as may be required to be maintained permanently under applicable laws, maintained and preserved from time to time.**

**5. DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN 8 YEARS**

**A. Companies Act, 2013**

1. Register of Buy-Back of securities from the date of completion of Buy-Back
2. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballot
3. Notices pertaining to disclosure of Interest by the Directors
4. Annual Returns with annexures

5. Register of Charges
6. Register of Debentures
7. Books of Accounts including vouchers and bills
8. Register of transfer and transmission of shares
9. Register of renewed and duplicate certificates
10. Documents relating to appointment of Managerial Personnel
11. Dividend reconciliation statement till the time the dividend is transferred to IEPF
12. Scrutinizers Report on AGM and Postal Ballot

### **B. Listing Regulations**

1. All reports filed with the Stock Exchange from time to time
2. Disclosures of various events and press releases
3. Intimations of Board Meetings

### **6. DISCLOSURES**

The Company shall disclose this Policy, as amended from time to time, on its website.

### **7. COMPLIANCE**

All employees of the Company are required to comply with the provisions of this Policy. Failure to comply by any employee of the Company with this Policy may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the compliance officer of the Company, who is in charge of administering, enforcing and updating this Policy.

### **8. AMENDMENT**

Any amendment in this Policy may be carried out with the approval of the Board of Directors of the Company. The Board of Directors shall review the policy periodically and may amend the same from time to time, as may be deemed necessary.

In case any amendment(s), clarification(s), circular(s) and guideline(s) issued by Securities and Exchange Board of India/Stock Exchanges, that is not consistent with the requirements specified under this Policy, then the provisions of such amendment(s), clarification(s), circular(s) and the guideline(s) shall prevail upon the requirements hereunder and this Policy shall stand amended accordingly effective from the date as laid down under such amendment(s), clarification(s), circular(s) and guideline(s). Such amendments shall be brought to the attention of the Board of Directors.

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