

JHAVERI CREDITS AND CAPITAL LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

PREAMBLE

This policy attempts to preserve and maintain documents of the organisation. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organisation. In order to preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

PURPOSE OF THE POLICY

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice.

Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

SCOPE

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

DEFINITIONS

"Preservation" is maintenance of documents, files and documents in usable form.

"Documents" means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

“Document keeping” means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

“Company” means Jhaveri Credits and Capital Limited

“Board of Directors” or “Board” means the Board of Directors of Jhaveri Credits and Capital Limited, as constituted from time to time.

“Policy” means policy on Preservation of documents.

“Storage Options” means

Online storage: Documents are kept on a server or hard drive and are immediately available for use over a network. This option is best for documents that must be accessed frequently.

Near-line storage: Documents are stored on media such as optical disks in jukeboxes or tapes in automated libraries which are attached to a network. Their retrieval is slower than compared to the online storage, it is appropriate for documents that are occasionally accessed.

Offline storage: Documents are stored on removable media and must be manually retrieved. This option provides the slowest access and should be used for documents that are only rarely needed.

“Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

POLICY

a) Legislative Framework and Standards

- Companies (Preservation and Disposal of Records) Rules, 1966
- Companies Act, 2013
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) Creation of Documents

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- facilitate necessary action by employees and their successors at any level at all points of time;
- facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;

- protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

c) Maintenance of Documents

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitized in business processes.
- Physical documents to be maintained in books and files.
- All digital and physical records to be saved at the registered office of the Company and no physical records can be migrated without permission of the respective Department Head
- A reproduction of any original record on microfilm or on any other medium shall be certified by the respective Head of Department of the Company to be a true and accurate reproduction of the original of such document.

d) Disposal and Destruction of Documents

- All documents mentioned in **Category A** which are temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed. However, all documents mentioned in **Category B** need to be permanently preserved by the Company during its entire life time. Utmost care is to be taken to ensure that files are well preserved.
- The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

	Category A	Category B
1.	Proxy forms	Certificate of incorporation
2.	Representation letters	Certificate of change of name (if any)
3.	Statutory registers maintained under the Companies Act, 2013	Memorandum and Articles of Association as amended from time to time

4.	Circular resolutions	Counter folios of Share Certificates issued from time to time
5.	Annual reports	
6.	Consent and Resignation Letters received from the Directors	
7.	Central Government Approvals received	
8.	NSDL/CDSL Files	
9.	Annual financial statements including: Annual Accounts; Directors Report; Auditors Report	
10.	Minute book	
11.	Declaration by directors under section 164 of the Companies Act, 2013	
12.	Declaration by directors under section 184 of the Companies Act, 2013	
13.	All documents under the Listing Agreement	
14.	Notice of General Meetings and Board Meetings	
15.	Documents on which the common seal of the company has been affixed.	
16.	Advertisements published	
17.	Disclosures under takeover code	
18.	Inward file giving information about the various correspondence received from outside agencies requiring secretarial action	