

JTL DEFENCE LIMITED
(ERSTWHILE RCI INDUSTRIES & TECHNOLOGIES LIMITED)

POLICY ON PRESERVATION OF DOCUMENTS

INTRODUCTION:

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors (the “Board”) of JTL Defence Limited has adopted this Policy for Preservation of Documents, as required under applicable regulations.

In any circumstance, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this policy and procedures until such time as this Policy is changed to confirm to the law, rule, regulation or standard.

OBJECTIVES:

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value).
- Statutory requirements under respective statutes.
- Litigation requirements.
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

DEFINITION:

In this policy unless the context otherwise requires

- a. “**Act**” means the Companies Act, 2013 and rules made thereunder, as amended from time to time
- b. “**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
- c. “**Company**” means JTL Defence Limited (Erstwhile RCI Industries & Technologies Limited)



- d. **“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;
- e. **“Key Managerial Personnel”** or **“KMP”** shall have the same meaning as described to it under the Act.
- f. **“Board”** or **“Board of Directors”** shall mean the Board of Directors of as may be re-constituted from time to time.
- g. **“Financial Year”** shall have the same meaning as described to it under the Act.
- h. **“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.

SCOPE:

These guidelines will be valid for determining preservation period for 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 financial year, in which the document has been 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 two categories:



Category	Description	Period of Preservation
1	As per Annexure A	Documents/Records whose preservation shall be permanent in nature
2	As per Annexure B	Documents/Records to be preserved for a minimum period of Eight Years

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 for a and other 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, 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.

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. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

MODE OF PRESERVATION

Records/documents may be preserved either physically or in 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.

GENERAL AUTHORISATION

The Policy shall be reviewed on a periodic basis and the Chairman and Managing Director / Whole-time Directors and Company Secretary are authorized jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.



Annexure - A

Documents / Records whose preservation shall be permanent in nature:

Sr. No.	Documents / Records
1	Certificate of incorporation
2	Memorandum and Articles of Association
3	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
5	Register and Index of Members, debenture-holders, if any or other security holders, if any
6	Register of Contracts as per Companies Act, 2013
7	Register of Charges as per Companies Act, 2013
8	Register of Investments as per Companies Act, 2013
9	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10	Authorization / licenses obtained from any statutory authority
11	Policies of the Company framed under various regulations
12	Register of disposal of records
13	Such other records as may be required under any law from time to time



Annexure – B

Documents / Record to be preserved for a minimum period of eight years:

Sr. No.	Documents / Records
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2	Annual Returns as per Companies Act, 2013
3	Register of Deposits as per Companies Act, 2013
4	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5	Annual financial statements including: - Annual accounts - Director's report - Auditors report
6	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
7	Income Tax Returns filed under Income Tax Act, 1961
8	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
9	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10	Copy of newspaper advertisement or publications
11	Compliance Reports received from any statutory authority
12	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13	Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

