JAYTEE ALLOYS & COMPONENTS LIMITED

Registered Office: A33/11, Site-4, Sahibabad, I.E.Sahibabad, Ghaziabad, Uttar Pradesh, India, 201010

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POLICY ON PRESERVATION OF DOCUMENTS

&

ARCHIVAL OF RECORDS

Document Summary

Version Number	Version No 2.0
Approved by	Board of Directors
Revision	Any revisions or modifications to this policy to be approved by the Chief Compliance Officer/Company Secretary and submitted to the Board for approval.

A. PREAMBLE

A policy on preservation of Documents would ensure safe keeping of the records and safeguard of the documents from getting mishandled, while at the same time avoiding overflow of inventory of documents

The Board of Directors has therefore formulated this policy in pursuance of the Companies Act, 2013 read with Secretarial Standards and Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations"), on preservation of the Documents to aid Jaytee Alloys & Components Limited (the "Company") in handling the documents efficiently.

The Company shall have a policy for preservation of documents (including through electronic mode), as approved by the Board, and disclose on its website certain events or information prescribed therein to the stock exchange. Such disclosures shall also be made available on the Company's website for certain periods as statutorily required.

Accordingly, the Board of directors of the Company, Jaytee Alloys & Components Limited, has adopted the Preservation and Archival of Company's Documents ("Policy").

B. OBJECTIVE OF THE POLICY

The objective of this Policy is to have a requisite framework for the preservation & archival of the Company's Documents, which facilitate:

The major objectives of the policy are:

a) Identification of records that are to be maintained and preserved **permanently**;
b) Identification of records that are to be maintained and preserved **for a specific period of time**;
c) Dissemination of equal, adequate and timely information to the stakeholders through the website of the Company;
d) The Stakeholders to track the performance of the Company over regular intervals of time and assess the Current status of the Company;
e) accessibility of maintained Documents at all reasonable times;
f) deciding the mode of preservation of Documents, whether in physical form or in electronic form.

This Policy shall be disclosed on the Company's website in order to inform the stakeholder to facilitate them to retrieve past information which is of statutory nature for a period as disclosed in the Policy.

C. DEFINITIONS AND INTERPRETATION

In this Policy, words and expressions shall have the meaning assigned to them below:

"Act" shall mean the Companies Act, 2013 and rules framed thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended from time to time;

"**Applicable Law**" shall mean any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India ("SEBI") and Ministry of Corporate Affairs ("MCA");

"Board" shall mean the Board of Directors of the Company;

"Books of Accounts" shall mean and include records maintained in respect of

a) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
b) all sales and purchases of goods and services by the company;
c) the assets and liabilities of the company; and
d) the items of cost as may be prescribed under section 148 of the Act in the case of a company which belongs to any class of companies specified under that section;

"Company" shall mean Jaytee Alloys & Components Limited;

"Directors" shall mean all the members of the Board of Directors of the Company, including the Independent Directors;

"Documents" shall mean refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained by the Company either in physical mode or electronic mode, as required to be maintained under any law or regulation for the time being in force;

"Electronic Form" shall mean any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it;

"Listing Regulation" shall mean The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time;

"Maintenance" shall mean keeping documents, either physically or in electronic form; and

"Preservation & Archival" shall mean keeping in good order to prevent them from being altered, damaged or destroyed and reasonably accessible.

D. CLASSIFICATION OF DOCUMENTS

- The classification of the Documents for the purpose of preservation shall be done as under:

a) Where there is a **period** for which the Document is required to be preserved **as per Applicable Law(s),** for the period required thereunder.

b) where the **period** for preservation of the Documents has **not been prescribed under the Applicable Law(s),** till such period those Documents have relevance with reference to any ongoing litigations, proceedings, complaints, disputes, contracts or any like matter.

1. The Documents whose preservation shall be **permanent in nature** in the archives of the Company are listed in **Annexure – A.**

2. The Documents whose preservation shall be for periods, **not less than eight years after completion of relevant transaction** and miscellaneous are listed in **Annexure – B.**

3. **In addition to the documents mentioned in Category '1' and '2' above** , other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained, shall be preserved for a stipulated period of time as per the existing Rules/Procedures/Practices of the Company or as per the applicable Statutory/Regulatory provisions in this regard.

E. MANAGEMENT OF THE DOCUMENTS

1. The preservation of the Documents is managed to **ensure that there is no tampering, alteration, destruction or any other action which would endanger the content, authenticity, utility and accessibility** of the Documents.

2. The **heads of the respective departments** of the Company shall be **responsible** for maintenance of the Documents.

F. DISPOSAL AND DESTRUCTION OF THE DOCUMENTS

1. The Documents specified in Annexure B which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Board of Director of the Company.

2. Disposal and destruction of the Documents will be done by the respective departments, post the required timeframe after the approval by the Board of Director of the Company. The activity is done by the delegated person as directed by the department head. The activity will be documented with information on date, time, name of the person approved & disposed and way of disposal.

3. Destruction of the Documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

4. The Documents may also be destroyed as follows:

a) Recycling of non-confidential papers;
b) Shredding or otherwise rendering of unreadable confidential papers; and
c) Deleting or destroying electronically stored data.

The above applies to both physical and electronic documents.

G. ARCHIVAL OF INFORMATION

1. Disclosure of events or information under Regulation 30(8) of the Listing Regulations.

   a) All events or information disclosed under Regulation 30(8) of the Listing Regulations and any other Regulations to the Stock Exchanges on which the Company is listed and hosted on the Company's website shall be available on the Company's website for a period of five (5) years or for such period as may be mandated under law from the date of uploading of the same on the website. However, if the disclosure requires a longer storage, the same will be considered appropriately.

2. Disclosure under other statutes and legislations

   b) All information required to be uploaded on the Company's website in pursuance of any other statute / legislation / regulation, shall be hosted on the Company's website, in the form, manner and for such period as may be mandated by that statute / legislation / regulation etc.

   c) In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one (1) year from the date of uploading or more if deemed necessary.

H. REMOVAL OF RECORDS FROM WEBSITE

Any Documents, information, form, or return etc. disclosed on the Website may be removed or deleted from the website after such disclosure period as stated above.

I. ARCHIVING

Post the disclosure period, the records removed from the website shall be placed in electronic archives. Depending upon the criticality/ importance of records being removed, the Company may retain those records having long term value in the archives for permanent/ specified period storage and to suitably deal with the records accordingly.

J. MODIFICATIONS

Any changes in the Policy shall be approved by the Board. The Board shall have the right to withdraw and / or amend and / or modify any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and mandatory.

K. GENERAL

Where the terms of this Policy differ from any existing or newly enacted law, rule, or regulation, the law, rule or regulation will take precedence over this Policy from the effective date of such law, rule or regulation.

L. DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company.

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ANNEXURE – A

INDICATIVE LIST

RECORDS TO BE PRESERVED PERMANENTLY

1.	Common Seal, If any
2.	Registration Certificate
3.	Constitutional documents i.e. Memorandum and Articles of Association of the Company and Certificate of Incorporation
4.	Affidavit from the subscribers to the memorandum and from person named as the first directors
5.	Minutes' Books of Board, General Meetings and Committees Meetings
6.	Statutory Registers as prescribed under the Companies Act, 2013,
7.	License and Permissions obtained from any statutory authority
8.	Statutory forms except for routine compliance
9.	Compliance/Secretarial Audit Report or any other reports
10.	Internal/Cost audit or any other Reports from the auditors
11.	Register of members
12.	Audited Financial Statements
13.	Documents related to purchase of shares/investments in an entity
14.	Books and documents relating to issue of share certificate, including blank forms of share certificates
15.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
16.	Register of disposal of records
17.	Orders / awards / decrees or any other received from Court or any other statutory body
18.	Business / Joint Venture / Sales Purchase Agreement / Loan / Lease Agreements
19.	Trade Mark / Copy Rights / Patents
20.	Such other records as may be required under any law from time to time

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ANNEXURE – B

RECORDS TO BE PRESERVED FOR MINIMUM PERIOD OF EIGHT YEARS

1.	Annual Returns, forms, returns, applications, declarations, certifications, and other documents filed with the Ministry of Corporate Affairs (MCA) / Registrar of Companies (ROC) in compliance with the Companies Act 2013 and the rules made thereunder, including any amendments or statutory modifications thereto.
2.	Board Meeting agendas, notes on agenda, supporting documents, annexures, presentations, reports, and other materials circulated or placed before the Board of Directors for consideration, deliberation, or approval.
3.	Attendance Registers
4.	Office copies of Notice of General Meeting and related papers
5.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
6.	All notices pertaining to disclosure of interest of director
7.	Correspondence with Department/Stakeholders
8.	Certificates surrendered to a Company
9.	Instrument creating a charge or modification
10.	Any other documents which have been so decided to be preserved by the Function/Department Heads, either under their own respective judgments or as required to be preserved by any specific Law
11.	Miscellaneous – Register & index of debenture-holders, if any
12.	Copy of newspaper advertisements or publications
13.	All such events or information which has been disclosed to stock exchange under SEBI(LODR) 2015
14.	Documents, forms, returns, applications, declarations, certifications, and other information submitted to the Registrar of Companies (ROC) / Ministry of Corporate Affairs (MCA) in compliance with the Companies Act, 2013 and the rules made thereunder, including any amendments or statutory modifications thereto.
15.	Disclosure/Return filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
16.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
17.	Annual Plans and Budgets
18.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013

19.	Tax Deducted at Source (TDS) records
20.	Income Tax Returns filed under the Income-tax Act, 1961, and/or any other applicable or relevant legislation, including subsequent amendments, replacement legislation, or applicable statutory provisions.
21.	Personnel records
22.	Any other electronic records
23.	Such other records as may be required under any law from time to time

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Footnote

1. The Board of Directors at its meeting held on 18-12-2024 has adopted this Policy first time.
2. The Board of Directors at its meeting held on 01-09-2026 has Modified this Policy based on Requirement of amendments and Need of the Company.

NAMAN JAIN Digitally signed by NAMAN JAIN Date: 2026.09.01 17:31:23 +05'30'

JAYTEE ALLOYS & COMPONENTS LTD.