

JFC FINANCE (INDIA) LIMITED

**POLICY FOR PRESERVATION OF
DOCUMENTS**

POLICY FOR PRESERVATION OF DOCUMENTS

LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of JFC Finance (India) Limited (the “Company”) is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

DEFINITIONS –

- **“Act”** means the Companies Act, 2013.
- **“Board”** means the Board of Directors of the Company or its Committee.
- **“Books of Account”** includes records maintained in respect of— (i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place; (ii) all sales and purchases of goods and services by the company; (iii) the assets and liabilities of the company; and (iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section.
- **“Company”** means JFC FINANCE (INDIA) LIMITED (JFC).
- **“Document(s)”** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, 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 on paper or in Electronic Form and does not include multiple or identical copies.
- **“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, 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.
- **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- **“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.
- **“Rules”** means rules framed under the Companies Act, 2013 or any previous Company law (to the extent such rules are in force) including any amendments, modifications, clarifications or reenactment thereof, for the time being in force

The words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law(s).

COVERAGE

This Policy is intended to guide the Company and its officers for maintenance of any Documents, their preservation and disposal.

PRESERVATION OF DOCUMENTS

As per Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, **Preservation of Documents** states that every listed entity is required to formulate a policy for preservation of documents, which shall be approved by the Board of Directors of the Company. Such Policy should classify the documents to be preserved in at least two categories as follows:

- (a) documents whose preservation shall be permanent in nature;
- (b) documents whose preservation period shall be not less than eight years after completion of relevant transactions.

Accordingly, Company shall maintain and preserve register and records, books and/or paper, books of accounts etc. ("Documents") as follows:

- a) Documents to be preserved permanently;
- b) Documents to be preserved for eight years;

a) Documents to be preserved permanently;

As required under the applicable provisions of the Act / Rules / Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

b) Documents to be preserved for eight years

As required under the applicable provisions of the Act / Rules / Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.

Documents to be maintained under this Policy shall be preserved in Physical or in Electronic Form/Mode as per the provisions of the Act / Rules / Regulations. For this purpose, the word "Electronic Mode / Form" shall have same meaning as defined under the Act / Rules, as the case may be.

PRESERVATION OF DOCUMENTS BEYOND THE PRESCRIBED PERIOD

Notwithstanding anything contained in the Act / Rules / Regulations, the Registrar of Companies or any other Competent Authority, may by order in writing, direct the Company to preserve any of the documents under this Policy beyond the prescribed period, for such period as specified in the order.

DESTRUCTION OF DOCUMENTS

The documents kept and preserved by the Company under this Policy for the respective periods may be destroyed after the expiration of such period as per the provisions of the Act / Rules / Regulations. In absence of such provisions, such documents shall be destroyed after obtaining

approval of the Managing Director by the concerned Departmental Heads to which such document(s) relates.

REGISTER OF DOCUMENTS DESTROYED

The Company shall maintain a register for documents destroyed as per this Policy. The Register of Documents Destroyed shall contain brief particulars of the documents destroyed, date and mode of destruction and all entries made therein shall be authenticated by the Secretary or such other persons as may be authorized by the Board for the purpose.

DISCLOSURE

The Company shall disclose this Policy on its website.

AMENDMENT IN LAW

Any subsequent amendment / modification in the Act / Rules / Regulations in this regard shall automatically apply to this Policy. While approving this Policy the Board of Directors has authorized the Company Secretary/Compliance Officer in consultation with the Managing Director of the Company to further modify or amend the Policy from time to time in view of the amendments / modifications or re-enactment in the Act / Rules / Regulations and such amendments / modifications etc. shall automatically form part of this Policy and shall have same force and effect as if approved by the Board of Directors of the Company. The Policy so amended shall be placed before the Board of Directors in the next meeting for their noting and ratification.
