

# J. J. FINANCE CORPORATION LIMITED POLICY ON PRESERVATION OF DOCUMENTS

#### **Preamble**

This is J. J. Finance Corporation Limited's (JJFCL) policy for preservation of documents, in hard and electronic media. JJFCL reserves the right to revise this Policy at any time. This policy is formulated in terms of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and will come into effect from 2<sup>nd</sup> December, 2015.

# Administrator

**Mr. Rabi Kumar Almal, Chief Executive Officer** shall be deemed to be the Administrator in charge of this Policy. His responsibilities are supervising the retention and destruction of documents according to the Document Preservation Schedule (below), and recording the actions taken to retain and/or destroy them.

The Board may modify and review the Document Preservation Schedule to comply with law and organizational policies.

## Other responsible parties

JJFCL's advisors and consultants are also subject to this policy. These responsible parties may have access to any document (whether containing confidential information or otherwise) for official purposes only with consent of the Administrator or concerned department-in-charge. When a responsible party leaves JJFCL, he/she is expected to return all such documents.

## **Electronic documents**

The Administrator on direction by Board, from time to time will establish standards for document integrity, including guidelines for handling electronic files, backups, archiving documents, and checking the reliability of the system.

Electronic Documents may be stored under digital signature of the concerned department in charge.

## **Emergency planning**

Documents shall be stored in a safe and accessible place, and essential documents should be regularly duplicated or backed up. The Administrator should develop reasonable procedures for document retention in the case of an emergency.

#### Privacy

The Administrator will determine how privacy of JJFCL's documents will be maintained and ensure compliance with laws, promulgated in this regard.

## Suspension of document destruction

JJFCL has a duty to preserve documents when litigation, an audit or a government investigation is anticipated.

Criminal liability may be statutorily imposed upon whoever "knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record or document with the intent to impede, obstruct, or influence the investigation or proper administration of any matter under any statute.

Thus, if Administrator/Board becomes aware that litigation, inspection or investigation has been instituted by any statutory authority, the Administrator on advice of the Board shall immediately suspend document destruction.

## Register of documents destroyed to be maintained

JJFCL shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by **Mr. Rabi Kumar Almal, Chief Executive Officer** as may be an authorized by the Board for the purpose.

## **Document Preservation Schedule (for both hard and electronic copies)**

## **Documents for permanent preservation**

- 1. Register of members
- 2. Index of members
- 3. Minutes of the General Meetings
- 4. Minutes of the Board Meetings
- 5. Annual Reports of the Companies
- 6. Any other matter as the Board may determine from time to time

# **Documents for periodic preservation**

2.1. Copies of all annual returns prepared and copies of all certificates and documents required to be annexed thereto

8 yrs from the date of filing

2.2. Signed Annual Accounts and all relevant vouchers and documents relating thereto

8 yrs from the date of closure of the financial year

2.3. Audited / Unaudited financial results and all other relevant documents

8 yrs from the date of closure of the relevant financial year

2.4. Legal documents, agreements, title deeds etc.

8 yrs from the date of expiry

2.5. Other documents, as specified by Board

For such period as may be determined by Board from

time to time.

Note: Permanent Preservation denotes preservation of documents over the last thirty two years which are maintained in the Registered Office of the Company.