RATHOD JEWELLERY MANUFACTURING LIMITED
(formerly known as Rathod Jewellery Manufacturing Private Limited)

POLICY ON PRESERVATION OF RECORDS

Under Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

CIN: U36910PN2012PLC142922
Registered Office: Plot No. F-12/1, MIDC Shiroli, Kolhapur, Hatkanangle, Maharashtra, India – 416122.

POLICY ON PRESERVATION OF RECORDS

1. PREAMBLE

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "**SEBI Listing Regulations**"), requires every Listed Company to formulate a Policy on preservation of documents approved by the Board of Directors. During the course of business, the Company generates several records either in physical or in electronic modes, most of the records are useful for a shorter span of time, hence such records are kept for a definite period of time, but some records may be needed to be kept for a longer period of time or permanently during the lifetime of the organization. In order to preserve such records, the Company needs to implement a well-considered, well-documented plan to ensure that they remain trustworthy and useful over a period of time.

Pursuant to the provisions of the SEBI Listing Regulations, the listed company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 8 (eight) years from the date of its publication (**"Mandatory Hosting Period"**) and thereafter, as per this Policy. Beyond the Mandatory Hosting Period, the disclosed information shall be archived for retrieval for a period of 2 (two) years (**"Archival Period"**) considering the requirements of the Applicable Laws.

2. PURPOSE AND SCOPE

In terms of the provisions of Regulation 9 of the SEBI Listing Regulations, the Company shall have a policy for Preservation of Documents, approved by its Board of Directors, classifying them in at least two categories as follows:

i. documents whose preservation shall be permanent in nature;
ii. documents with preservation period of not less than eight years after completion of the relevant transactions, in accordance with the Applicable Law

Accordingly, the Board of Directors has formulated and approved this policy to preserve the documents of the Company.

Also, this policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The policy ensures that the Company maintains both physical and electronic records/ documents preserved for such minimum period as required by the law for the time being in force and adequate protection and preservation of the documents of the Company as per the applicable statutory requirements. All records must be kept, keeping in mind the confidentiality and nature of the documents. The policy also deals with the retrieval process and disposal / destruction of obsolete Records.

This policy will guide the Company, employees and officers in handling the documents efficiently and maintenance of any documents, their preservation and disposal/destruction.

3. DEFINITIONS

(a) **"Act"** means the Companies Act, 2013 & rules made thereunder and as amended from time to time**.**

(b) "**Applicable Law**" means any law, rules, regulations, circulars, guidelines or standards applicable on the Company under which any guideline / provision with regard to the preservation of the Documents has been prescribed.

(c) **"Authorized Person"** means the functional head of the concerned department or any person duly authorised by the Board.

(d) **"Company"** means Rathod Jewellery Manufacturing Limited. (formerly known as Rathod Jewellery Manufacturing Private Limited)

(e) "**Document(s)**" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record (including required under or in order to comply with the requirements of any Applicable Law) maintained on paper or in Electronic Form and does not include multiple or identical copies.

(f) "**Electronic Form**" means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other digital 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.

(g) **"Maintenance"** means keeping documents either physically or in electronic form.

(h) **"Policy"** means Policy for Preservation of Documents.

(i) **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.

(j) **"Website"** means the official website of the Company, or any modification thereof.

Any term used but not defined in this Policy shall have the meaning assigned to it under the Act, the SEBI Listing Regulations, or any other Applicable Law, to the extent applicable to the Company.

4. GUIDELINES

Regulation 9 of SEBI Listing Regulations, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows:

a. documents whose preservation shall be permanent in nature subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

b. documents with preservation period of not less than eight years after completion of the relevant transactions, in accordance with the Applicable Law, subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.
Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

a. documents that needs to be preserved and retained permanently;

b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;

c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company; and

d. where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure- I and II**

5. PRESERVATION OF DOCUMENTS / RECORDS

The preservation of documents shall be done in the following manner:

(i) All statutory records required to be maintained under any applicable law/ or under any directions or instructions from any statutory or Regulatory authority shall be preserved for the period.

(ii) All documents relating to any show cause notice, demand notice, order, decree, direction from any court, tribunal, or any judicial or administrative authorities shall be preserved for a minimum period of eight years from the date of disposal of the matter.

(iii) Documents, in respect of which no minimum maintenance timeline is stipulated under any of the law shall be preserved.

(iv) Copies of all material licenses for conducting business of the company should be preserved permanently.

(v) The events or information which have been disclosed by the company to Stock Exchanges in accordance with listing regulations shall be available on the Company's website for a period of eight years from the date of its hosting on its website. Upon expiry of period of eight years from the date of such disclosures being hosted on the website of the Company, the disclosed event or information will be archived as per this policy.

(vi) The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

6. CUSTODY OF DOCUMENTS

(i) All documents shall be under the proper custody of concerned functional head(s) or such other officer or employee as assigned by him as Authorised Person.

(ii) It shall be the responsibility of the concerned head of department or Authorised Person to keep the annexed Documents Preservation schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective departments and for this purpose, they shall communicate any changes desired in the abovementioned schedule to the Company Secretary.

(iii) The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents along with the register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/department.

(iv) All documents can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.

(v) In case of any inconsistency between the Documents Preservation schedule annexed to this Policy and the provisions of the applicable Acts/Rules/Regulations, the provisions of such Acts/Rules/Regulations shall prevail.

(vi) All digital records/ scanned copies of physical records may be stored or preserved in such servers in the control of system administrator or any cloud-based servers as may deem fit by the Authorised Person, which can be retrieved at any time during the preservation period.

(vii) An employee, who seeks relieve from the company, shall transfer all digital records in his/her control to system administrator before relieving him/her from the service of the company subject to the satisfaction of concerned functional heads.

7. DISPOSAL AND DESTRUCTION OF RECORDS

(i) All physical records not required to be preserved permanently under any law for the time being in force may be either destroyed or converted to electronic format, after the minimum preservation period of eight years subject to the discretion of the functional heads or the Authorised Person. All electronic records shall be preserved permanently.

(ii) The Company shall maintain registers wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the by concerned functional heads or Authorised Person, after obtaining prior approval of Whole time Director of the Company.

(iii) The register of the documents destroyed shall be produced whenever required by the concerned authority/auditors.

(iv) Where the Company has been served with any notice requisitioning documents from any of the regulatory and statutory authorities or any litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed-off finally.

(v) The IT department shall make appropriate provision for back up for electronic documents. In the event that it is necessary to manually dispose of an electronic document, the IT Department shall use the "Permanent Delete" function to permanently dispose of electronic documents.

8. DISCLOSURE

The above Policy and subsequent amendments thereto shall be disclosed on the Company's Website.

9. IMPLEMENTATION AND REVIEW OF THE POLICY

The Board shall be responsible for implementation and review of this Policy in whole or part. Any amendment or waiver of any provision of this Policy should be approved by the Board of Directors of the Company. In the event of any conflict between the provisions of this Policy and applicable laws, the provisions of applicable laws shall prevail and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force. Any subsequent amendment/ modification in the Applicable Laws shall automatically apply to this policy.

Effective Date: 28-09-2026
Place: Kolhapur

Note: Approved in the meeting dated 28-09-2026

ANNEXURE – I

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

S. No.	Documents
1.	Property records including purchase and sale deeds, licences, copyrights, patents & trademarks
2.	Common Seal
3.	Scrutinizer's Report
4.	Certificate of Incorporation
5.	Minutes of Board, Committee and Shareholders' Meetings
6.	Register of Members including index and other Statutory Records
7.	Personal files of all live employees
8.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

ANNEXURE – II

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF RELEVANT TRANSACTION

S. No.	Documents	Preservation Period	Concerned Department
1.	Books of account including relevant books and papers.	8 years from the end of the financial year or completion of assessment under the Income-tax Act, 1961, whichever is later	Finance & Accounts
2.	Disclosures/ notices by a director of his interest	Lifetime	Secretarial
3.	Instrument creating a charge or modification	8 years from the date of satisfaction of the charge by the Company	Secretarial
4.	Annual return and copies of all certificates and documents required to be annexed thereto	Lifetime	Secretarial
5.	Office copies of Notice of General Meeting and related papers	Lifetime	Secretarial
6.	Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers	Lifetime	Secretarial
7.	Registers of Fixed assets	Lifetime/8 years from the end of the financial year or completion of assessment under the Income-tax Act, 1961, whichever is later/Till the disposal of asset if beyond 8 years period	Finance & Accounts
8.	Attendance Register of Board Meetings	Lifetime	Secretarial
9.	Attendance Register of Committee Meetings	Lifetime	Secretarial
10.	Attendance Slips of General Meetings	Lifetime	Secretarial
11.	Legal Memoranda and Opinions including subject matter files	8 years after the close of the matter	Legal
12.	Litigation files	8 years after the close of the matter	Legal
13.	Insurance Policies	8 years from the expiry of the policy	Finance & Accounts
14.	Investment Records	8 years	Finance & Accounts
15.	Journal Entry support data	8 years	Finance & Accounts
16.	Bank Statements	8 years	Finance & Accounts
17.	Tax Deducted at Source Records	8 years from the end of the financial year or completion of assessment under the Income-tax Act, 1961, whichever is later	Finance & Accounts
18.	Income Tax papers	8 years from the end of the financial year or completion of assessment under the Income-tax Act, 1961, whichever is later	Finance & Accounts
19.	Service Tax / GST papers	8 years from the end of the financial year or completion of assessment, whichever is later	Finance & Accounts

RATHOD JEWELLERY MFG. LTD. KOLHAPUR