

ARCHIVAL POLICY

ZODIAC-JRD-MKJ LIMITED

AMENDED ON MAY 29, 2025

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1. Introduction

In the current world of communication, information which flows through various modes plays a pivotal role. Information constitutes one of the most valuable assets of an organisation. In an urge to develop and maintain a complete information management strategy, the policy on archiving of Documents (this “Policy”) plays a vital role in completing the Information Management Life Cycle of a company.

The information content today co-exists in Physical and Electronic Form. In this context, it is imperative to have an integrated information system with clear objectives for the sound management of electronic and paper archives.

The major purpose of this Policy is to establish a systematic basis for archiving which will result in cost-effective, efficient and reliable archive management within the organization.

2. Definitions

- (i) **“Applicable Law”** means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed
- (ii) **“Appraisal”** is the process by which records are evaluated to determine whether they should be retained or destroyed, based on a set of principles.
- (iii) **“Archive/archiving”** is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.
- (iv) **“Board”**, in relation to the Company, means the collective body of the directors of the Company.
- (v) **“Company”** means Zodiac-JRD-MKJ Limited.
- (vi) **“Designated official”** means an officer of the Company entrusted with the responsibility of administering this Policy and implementing reasonable processes and procedures concerning archival of Records or Documents.
- (vii) **“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 accessible to the Company.
- (viii) **“Officer”** includes any director, manager or key managerial personnel or any person in accordance with whose directions or instructions the Board or any one or more of the directors is or are accustomed to act.
- (ix) **“Records / Documents”** includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law.

Any other term not defined herein shall have the same meaning as defined in the Act, the SEBI Regulations 2015, Securities Contracts (Regulation) Act, 1956 or any other applicable law or regulation.

3. Objectives

The objective of this Policy is to comply with Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, ("**LODR Regulations**") as mentioned below:

"The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

Further, all the presentations and audio/recordings as made available under LODR Regulations, shall be hosted on the website of the listed entity for a minimum period of two years and thereafter as per preservation policy of the Company in terms of clause (b) of Regulation 9 of the LODR Regulations."

The major focus of this Policy is to create archives which provide the evidence required for carrying out daily activities and keeping track of transactions entered into by the Company. The following are the key objectives of this Policy:-

- To capture and store all relevant Records and Documents.
- To ensure security and verified access to all relevant Records and Documents.
- To preserve the Documents or Records for legal, administrative and historical purposes.
- To dispose the Records or Documents in accordance with the authorised retention and disposal schedule.
- To ensure back-up and allow for continuity in the event of a disaster.
- To comply with all regulatory and other legal requirements.

Thus, this Policy aims at ensuring creation and management of authentic, reliable and usable archives for accountability purposes and for preservation of the Company's collective memory.

4. Archival Methodology

The Company's archival records are those records which are no longer current but have been chosen or classified as "to be preserved for a specified length of time". The records are classified into the following categories:

1. The Records that are eligible to become archives may need to be kept permanently because they constitute evidence or for some other legal reason.

2. Documents which do not require permanent preservation but require years of preservation as prescribed under Applicable Law.

The Archives might consist of all the Documents prescribed or maintained as per the Preservation of Documents Policy of the Company and other Documents which are of relevance to the Company in general. An archival record may be the only copy that exists anywhere. Archival records are maintained in both the formats viz., Physical and Electronic Form.

A. Physical records

Paper and other records are filed appropriately in the corporate filing system as physical files which are under the control of designated officials. All physical archives are stored in the Head Office and in each of the Company's Regional Offices or Area Offices, Plants, Management Development Centre, Training & Development Centre and in any other locations. The archives are maintained in a well secured area with restricted access with clear filing systems and codes.

B. Electronic records

Archival of electronic documents is systematic and the Designated Official is responsible for the operation and maintenance of archives in electronic format with technical support from the Information Management division. All archives are strictly confidential and relevant User guidelines are in place and have been issued to all concerned and are accessible on the intranet only.

5. Statutory Compliances / Disclosures

The Company will ensure dissemination of all information as required under the Fair Disclosure Policy adopted by the Board at its meeting held on 11/01/2019 and also the Policy of Disclosure of Material Events or information, adopted by the Board at its meeting held on 11/01/2019. The Company will ensure displaying of the information in its official website, under the appropriate classification. The Company will also ensure that the disclosures that are made on its website will be available for downloading or viewing for a minimum period of five years. Further, the Company will ensure that all disclosures made by the Company that are required to be communicated to the shareholders are disseminated on its website.

6. Monitoring and Review

This Policy will be regularly monitored and reviewed to ensure that it remains relevant to the Company's business aims and requirements. Compliance with this Policy and associated procedures will be monitored on an ongoing basis through self-assessment procedures and reviews. The continuous monitoring ensures that:

No illegal records disposal takes place.

There is a timely review of procedures to ensure that they, the procedures, are relevant, useful and meet the statutory needs. Unauthorized access to records is averted.

7. Amendment

The Board has the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, subject, however, to the condition that such alterations will be in consonance with the provisions of the Applicable Law.

8. Disclaimer

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any Applicable Law governing the Company, such Applicable Law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.