

## Policy For Preservation And Disposal Of Documents

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### 1. BACKGROUND

As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “**SEBI Listing Regulations**”), a listed entity is required to frame a policy for preservation of documents. The Board of Directors (hereinafter referred to as “**the Board**”) of John Cockerill India Limited (hereinafter referred to as “**the Company**”) has adopted this Policy for Preservation and Disposal of Documents.

Should there be any inconsistency with the requirements of global policy of the Company, the requirements of the SEBI Listing Regulations shall prevail.

### 2. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories :

- A. The documents of a permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure 2**) shall be preserved by the Company for the term not less than eight years after completion of relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved by the Company for the term not less than eight years after completion of transactions.

Provided further that the company may keep the documents as specified above in electronic mode.

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### **3. ROLES & RESPONSIBILITIES**

The respective Department Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

### **4. DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate / unimportant / irrelevant.

This applies to both Physical and Electronic Documents.

### **5. GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws / regulations either existing or arising out of any amendment to such laws / regulations or otherwise and applicable to the Company from time to time.

### **6. COMMUNICATION AND DISSEMINATION OF THE POLICY**

A copy of this policy shall be posted on the intranet and website of the Company.

### **7. AMENDMENTS**

The Board may subject to the applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions for any law for the time being in force.

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### Annexure 1

#### Documents whose preservation shall be permanent in nature

S. No.	Nature of Document(s)
1	Registration Certificates
2	Licenses & Statutory Approvals
3	Statutory Registers required under applicable laws
4	Audited financial statements
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Material Agreements / Contracts relating to Fixed Assets
9	Orders issued by Courts / Statutory bodies
10	Investment Documents / proofs including certificates, etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

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### Annexure 2

#### Documents with preservation period of not less than eight years after completion of the relevant transactions

S. No.	Nature of Document(s)
1	Books of Accounts
2	Annual Return(s)
3	Personnel Documents
4	Insurance Policies / Claims under various policies
5	Correspondences with Departments / shareholders
6	Non Statutory Registers / Documents
7	Films, Videos, CDs, DVDs, tapes, etc.
8	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

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