RAJKOT INVESTMENT TRUST LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. PREAMBLE

This Policy for Preservation of Documents ("Policy") is framed in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"), the Companies Act, 2013 and other applicable statutory and regulatory requirements.

The purpose of this Policy is to ensure systematic identification, classification, maintenance, preservation, retention and disposal of documents and records maintained by the Company in physical and electronic form.

2. OBJECTIVE

The objectives of this Policy are:

a) To establish a framework for preservation and maintenance of documents and records;

b) To ensure compliance with applicable legal and regulatory requirements;

c) To facilitate retrieval of records whenever required;

d) To ensure proper disposal of records after expiry of the retention period;

e) To safeguard the Company's records from loss, destruction, tampering or unauthorized access.

3. APPLICABILITY

This Policy shall apply to:

- All departments and functions of the Company;
- All records and documents maintained in physical or electronic form;
- Statutory records;
- Secretarial records;
- Financial records;
- Regulatory records;
- Operational records.

4. DEFINITIONS

4.1 Act

Means the Companies Act, 2013 and the rules made thereunder.

4.2 Document

Includes summons, notices, requisitions, orders, declarations, forms, registers, books, records, agreements, correspondence, electronic records and any other records required to be maintained under applicable laws.

4.3 Electronic Record

Shall have the meaning assigned under the Information Technology Act, 2000.

4.4 Preservation

Means maintenance of documents in usable form and protection from destruction, alteration, loss or unauthorized access.

5. CLASSIFICATION OF DOCUMENTS

Documents shall be classified into the following categories:

Category A – Permanent Preservation

Documents whose preservation shall be permanent in nature.

Category B – Temporary Preservation

Documents required to be preserved for a specified period after which they may be destroyed in accordance with this Policy.

6. DOCUMENTS TO BE PRESERVED PERMANENTLY

The following records shall ordinarily be preserved permanently:

Corporate and Statutory Records

- Certificate of Incorporation;
- Certificate of Commencement of Business (where applicable);
- Memorandum of Association;
- Articles of Association;
- Alterations to Constitutional Documents;
- Common Seal Records (if applicable).

Board and Shareholder Records

- Minutes Books of Board Meetings;
- Minutes Books of Committee Meetings;
- Minutes Books of General Meetings;

- Attendance Registers relating to Board and General Meetings.

Statutory Registers

- Register of Members;
- Register of Directors and Key Managerial Personnel;
- Register of Charges;
- Register of Contracts and Arrangements;
- Other statutory registers prescribed under applicable laws.

Regulatory Approvals

- Licences and registrations issued by regulators;
- RBI Registration Certificate;
- Stock Exchange approvals;
- SEBI approvals and permissions.

Property Records

- Title deeds;
- Lease deeds;
- Intellectual property registrations;
- Major contracts having continuing effect.

Litigation Records

- Judgments having continuing significance;
- Orders affecting ownership, rights or liabilities of the Company.

7. DOCUMENTS TO BE PRESERVED FOR A SPECIFIED PERIOD

The following records shall be preserved for the period prescribed under applicable laws or for the period mentioned below, whichever is longer:

Document Type	Retention Period
Books of Accounts	8 Financial Years
Financial Statements	8 Financial Years
Annual Returns	8 Financial Years

Tax Records 8 Financial Years

Bank Statements 8 Financial Years

Payroll Records 8 Financial Years

Employee Records after Separation 8 Years

Internal Audit Reports 8 Years

Secretarial Audit Reports 8 Years

Compliance Reports 8 Years

Agreements and Contracts 8 Years after expiry

Loan Documents 8 Years after closure

Customer Records (NBFC) As prescribed by RBI/PMLA

KYC Records Minimum 5 Years after cessation of relationship or as prescribed by law

Correspondence Files 8 Years

Insurance Records 8 Years after expiry

The above periods may be modified based on statutory requirements.

8. ELECTRONIC RECORDS

Electronic records shall be maintained with adequate safeguards including:

- Secure storage systems;
- Access controls;
- Backup mechanisms;
- Disaster recovery arrangements;
- Data encryption where necessary.

Electronic records shall be considered valid records where maintained in accordance with applicable laws.

9. RESPONSIBILITY FOR PRESERVATION

Board of Directors

The Board shall oversee implementation of this Policy.

Company Secretary

The Company Secretary shall:

- Ensure compliance with statutory retention requirements;
- Maintain secretarial and regulatory records;
- Coordinate document preservation activities.

Department Heads

Each Department Head shall:

- Maintain records under their control;
- Ensure preservation and retrieval;
- Ensure secure disposal after expiry of retention periods.

10. DESTRUCTION OF DOCUMENTS

Documents may be destroyed only after expiry of the applicable retention period and with approval of the designated authority.

Methods of destruction may include:

- Shredding;
- Incineration;
- Secure electronic deletion;
- Other approved methods.

The destruction process shall ensure confidentiality and protection of sensitive information.

11. EXCEPTIONS

Notwithstanding the retention periods specified in this Policy, documents shall not be destroyed if:

- Litigation is pending;
- Regulatory investigation is ongoing;
- Government inquiry is in progress;
- A legal hold has been imposed;
- Retention is required by any court, tribunal or regulatory authority.

Such records shall be preserved until the matter is finally concluded.

12. CONFIDENTIALITY AND SECURITY

The Company shall take appropriate measures to:

- Prevent unauthorized access;
- Prevent loss or tampering of records;
- Protect confidential and sensitive information;
- Ensure business continuity.

Access to records shall be restricted to authorized personnel.

13. INSPECTION AND RETRIEVAL

Records shall be maintained in a manner that permits:

- Easy retrieval;
- Regulatory inspection;
- Internal audit review;
- Legal verification.

The concerned department shall provide records whenever required by regulators, auditors or authorized personnel.

14. REVIEW OF POLICY

This Policy shall be reviewed periodically and at least once every year or whenever required due to changes in applicable laws or regulatory requirements.

15. AMENDMENTS

The Board of Directors may amend this Policy from time to time in accordance with applicable laws and regulatory requirements.

Any amendment in law affecting preservation requirements shall automatically apply to this Policy.

16. EFFECTIVE DATE

This Policy shall come into force from the date of approval by the Board of Directors and shall remain effective until modified or replaced.

ANNEXURE – DOCUMENT RETENTION MATRIX

The Company Secretary may maintain and update a detailed Document Retention Matrix specifying:

- Document Name;

- Custodian Department;
- Preservation Period;
- Mode of Preservation;
- Disposal Method;

in line with applicable legal and regulatory requirements.