J.K. SHAH COMMERCE EDUCATION LIMITED

POLICY ON PRESERVATION OF RECORDS

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

POLICY ON PRESERVATION OF RECORDS

1. PREAMBLE

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "**SEBI Listing Regulations**"), requires every listed entity to formulate a policy on preservation of documents approved by its Board of Directors. During the course of business, a 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.

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; and
ii. documents with preservation period of not less than 8 (eight) years after completion of the relevant transaction.

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

This Policy shall apply to all business records of the Company, whether maintained in physical or electronic form , 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) "**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.

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

(c) **"Board of Directors"** Board of Directors" or "Board" means the Board of Directors of the Company

(d) **"Companies Act"** means the Companies Act, 2013 & rules made thereunder**.**

(e) **"Company"** means J.K.Shah Commerce Education Limited.

(f) "**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.

(g) "**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.

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

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

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

4. 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. The list of Documents which shall be permanently preserved is given in Annexure A to this Policy.

(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. The list of Documents which shall be preserved for a period not less than 8 (eight) years after completion of the relevant transaction is given in Annexure B to this Policy.

(iii) Documents in respect of which no minimum preservation period is prescribed under any applicable law shall be preserved for such period as may be determined by the concerned functional head or Authorised Person, considering their business utility and legal significance. Copies of all material licences required for carrying on the business of the Company should be preserved permanently.

5. 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 Companies Act, the SEBI Listing Regulations and applicable acts/ rules/ regulations 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 Companies Act, the SEBI Listing Regulations and applicable acts/rules/regulations.

(v) 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 be deemed fit by the Authorised Person, which can be retrieved at any time during the preservation period.

(vi) An employee who is relieved from the services of 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.

6. 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 8 (eight) years subject to the discretion of the functional heads or the Authorised Person. Electronic records shall be preserved in accordance with the retention periods prescribed under this Policy and applicable laws.

(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 concerned functional heads or Authorised Person, after obtaining prior approval of the Chairman & Managing 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.

7. DISCLOSURE

The above Policy and subsequent amendments thereto shall be disclosed on the Company's website at www.jkshahcommerceeducation.com

8. 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.

9. EFFECTIVE DATE

This Policy shall come into effect from October 5, 2026, being the date of its approval by the Board of Directors.

Annexure A

Documents/ Records whose preservation shall be permanent in nature

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

(a) Certificate of Incorporation.
(b) Memorandum and Article of Association.
(c) Agreements made by the Company with stock exchanges and depositories etc.
(d) Minutes of the Board Meetings and Board Committees as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
(e) Minutes of General Meetings (including AGMs) as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
(f) Register of directors and Key Managerial Personnel.
(g) Register of Renewed and Duplicate Share Certificates
(h) Share certificate forms and related books and documents as per Rule 7(3) of Companies (Share Capital and Debenture) Rules, 2014
(i) Register of Charges in Form CHG-7 as per Rule 10(4) of the Companies (Registration of Charges) Rules, 2014
(j) Register of Members along with the index (Form MGT-1)
(k) Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities) Form MBP-2.
(l) Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person) Form MBP-3.
(m) Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)
(n) Property records, title deeds, ownership records and documents issued by Government Authorities.
(o) Authorizations/ licenses obtained from any statutory authority.
(p) Material agreements/ contracts, which, even if terminated, may have an impact on business.
(q) Orders/judgments issued by Courts/statutory bodies and other background documents relevant for understanding such Orders
(r) Register of Allotments of Securities
(s) Such other records as may be required under any law from time to time.

Any other document, certificate or statutory register required to be preserved permanently under applicable laws. in terms the Companies Act, 2013 and/ or SEBI Listing Regulations.

Annexure B

Documents/ Records to be preserved for a minimum period of eight years.

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

(a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
(b) Books of Accounts including work papers and other documents related to the audit including Tax and GST, Accounts Payable/Receivable ledgers, General Ledger, Annual Plans and Budgets.
(c) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013.
(d) Register of Deposits as required under the Companies Act, 2013.
(e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
(f) Notices in Form MBP-1 for disclosure of interest under section 184 of Companies Act, 2013 and Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014, received from directors of the Company.
(g) Instrument creating a charge or modifying a charge, as per Rule 10(4) of the Companies (Registration of Charges) Rules, 2014.
(h) Changes to the Memorandum and Articles of Association.
(i) Employment record for the employees of the Company.
(j) Office Copies of Notices, Register of Postal Ballot, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
(k) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
(l) Documents as are required to be maintained under relevant laws relating to direct and in-direct taxes.
(m) Marketing documents.
(n) Press releases.
(o) Legal documents including but not limited to contracts, legal opinions, orders passed by various courts and tribunals, documents relating to cases pending in any court, tribunal or authority.
(p) Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition.
(q) Payroll-related records, including TDS, PF, ESI returns and challans.
(r) Register of Buy-back of Securities.
(s) Business / Joint Venture / Sales Purchase Agreement / Loan / Lease Agreements.
(t) Trademarks, copyrights and patents.
(u) All e-forms filed with the Registrar of Companies pursuant to provisions of the Companies Act 2013.

Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.