



POLICY ON PRESERVATION OF DOCUMENTS

CLAY CRAFT INDIA LTD

(formerly known as Clay Craft (India) Private Limited)

CIN: U26933RJ1988PLC004677

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POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Listing Regulations"] requires every listed Company to have a policy on Preservation of Documents/Records maintained by the Company either in physical mode or electronic mode. Therefore, the Board of Directors (the "Board") of Clay Craft India Ltd (the "Company") has approved the Policy for Preservation of Documents of the Company.

2. PURPOSE

The objective of this Policy is to have a binding framework for the preservation of documents of the Company. The preserved documents must be accessible at all reasonable times.

3. DEFINITIONS

- (i) **"Act"** means the Companies Act, 2013 and the Rules made thereunder.
- (ii) **"Applicable Law"** means any law, rules, circulars, guidelines or standards issued by the Securities and Exchange Board of India, Ministry of Corporate Affairs and the Institute of Company Secretaries of India under which the Preservation of the Documents has been prescribed.
- (iii) **"Board"** means the Board of Directors of the Company.
- (iv) **"Company"** means Clay Craft India Ltd.
- (v) **"Documents"** means all papers, records, files, books including in soft/digital format etc. and as required to be maintained under any law or regulation for the time being in force.

4. INTERPRETATION

The terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and/or the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

5. RESPONSIBILITY FOR PRESERVATION OF DOCUMENTS

The preservation of Documents should ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents. The Head of respective Department shall be responsible to ensure for the preservation of documents pertaining to their area of responsibilities in accordance with the applicable laws/regulations. The listing documents and records in physical form pertaining to applicable laws shall be in custody of the Company Secretary or Compliance Officer or such any other person as authorized by the Board of Directors.

6. CLASSIFICATION OF DOCUMENTS

A. Documents with preservation for a period of not less than eight (8) years after completion of the relevant transactions.

Documents required under the Companies Act, 2013 and various SEBI Regulations/Guidelines:

- Notice and Agenda and notes on Agenda of various Meetings;
- Register of Allotments;
- Register of Buy-Back;
- Register of Deposits;
- Register of payment of Dividend;
- Dividend reconciliation Statements (preserve as long as dividend is unpaid);
- Register of Director Attendance;
- Register of Proxy;
- Register of Inspection;
- Register of Investor Complaints;
- Register of Sweat Equity Shares;
- ROC and Stock Exchange Filings;
- Legal Memoranda and Opinion;
- Corporate Governance Report;
- Statement of deviation or variation in use of issue proceeds;
- Certificate of Reconciliation of share Capital and Share Transfer Audit;
- Intimation of Appointment of Share Transfer Agent;
- Disclosures under Code of Conduct for Prevention of Insider Trading and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information;
- Disclosure of Price Sensitive Information and intimation regarding Board Meeting to the Exchanges;
- Shareholding pattern prior to the listing of Securities;
- All other events and information as per regulation 30(8) of SEBI (Listing Obligations and disclosure requirements) Regulations 2015 for a period of Five Years.

B. Documents whose preservation shall be Permanent in nature:

All the documents of the Company which are permanent in nature shall be kept by Company in hard copy at the Registered Office of the Company or any other place as decided by the management of the Company described as follows:

- All type of Certificates i.e. Certificate of Incorporation, Certificate for change in name of Company;
- Memorandum and Articles of Association of Company;
- Minutes Books of Company in binding form;
- Register of Postal Ballot and Scrutinizer Report;
- Register and Index of Debenture Holder;
- Register of Members of Company including Non-resident investor and foreign investors;
- Register of Charge;
- Register of Investments;
- Register of Transfer and Transmission of Securities;

- Register in respect of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Register in Respect of SEBI (Prohibition of Insider Trading Regulations), 2015;
- All type of Licenses and Permits;
- Court Orders;
- Annual Reports and Return;
- Annual Audit Reports and Financial Statements;
- All property documents and various type of Lease-Deed entered by the Company.

C. Contracts, Agreements and Legal Case Files:

Final including execution copies of all the contracts and agreements entered into by the Company should be retained permanently and wherever required, should be destroyed only with the written permission of management. All the files relating to Legal cases filed by the Company or filed against the Company should be preserved permanently by the Company.

D. Audio/Video Recordings of General Meetings, Board and Committee Meetings:

All the audio or video or electronic recordings of all General Meetings, Board Meetings and Committee Meeting shall be preserved upto the completion of Audit of that particular year.

7. DISPOSAL AND DESTRUCTION OF DOCUMENTS

Post the required time-frame for preservation of the documents, the respective Departments may destroy the records in the desired manner.

8. REVIEW OF THE POLICY

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

9. AMENDMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to the SEBI Regulations.

Approved in the Board Meeting held on 20th August, 2025.
