

# ARCHIVAL POLICY FOR KAY JAY FORGINGS LIMITED

CIN: U74899DL1983PLC029298

Registered Office: A-8, Maya Puri Industrial Area Phase-1, New Delhi- 110 064 Delhi, India.

## ARCHIVAL POLICY

### 1. INTRODUCTION

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- a. Regulation 30 (8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) requires every listed entity to disclose on its website, all such events or information which have been disclosed to the stock exchange(s) under the Listing Regulations for a minimum period of 5 (five) years and thereafter to archive the same as per the archival policy of the Company, which is also required to be hosted on the website of the Company. Regulation 8 of the Listing Regulations requires listed entities, wherever applicable, shall co-operate with and submit correct and adequate information to the intermediaries registered with Securities and Exchange Board of India (“**SEBI**”) such as credit rating agencies, registrar to an issue and share transfer agents, debenture trustees etc, within timelines and procedures specified under the SEBI Act 1992, regulations and circulars issued there under. Additionally, Regulation 46 (2) (oa) (ii) (a) of the Listing Regulations requires listed entities to host on their website, presentations and audio-video recordings pertaining to post earnings/ quarterly calls (by whatever name called) conducted physically or through digital means for a minimum period of 5 (five) years and thereafter to archive the same as per the archival policy of the company.
  
- b. Accordingly, the Board of Directors of Kay Jay Forgings Limited (“**Company**”) has adopted this Archival Policy (“**Policy**”) on **August 18, 2025** for archival of events and information, after the period for which they were mandatorily required to be hosted on Company’s website.

### 2. OBJECTIVES

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This Policy aims to provide a framework for the effective archival of documents hosted on the website of the Company at [www.kayjayforgings.com](http://www.kayjayforgings.com) as required by the Listing Regulations in order to inform the stakeholders to facilitate them to retrieve past information, which is of a statutory nature for a period as discussed in the Policy. Through this Policy, the Company intends to establish a framework for ensuring greater accessibility of adequate, timely and reliable information pertaining to the Company on a timely and regular basis for all its stakeholders.

### 3. DEFINITIONS

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- a. “**Act**” means the Companies Act, 2013, along with the relevant rules, regulations, clarifications, circulars and notifications issued thereunder;
  
- b. “**Applicable Laws**” means all applicable statutes, enactments, laws, ordinances, bye-laws, rules, regulations, guidelines, notifications and circulars having force of law, notices, and/or judgments, decrees, injunctions, writs or orders of any court, statutory or regulatory authority, tribunal, board

or stock exchange in any jurisdiction as may be in force and effect during the subsistence of this Policy under which the archival of Documents and Records has been prescribed;

- c. "**Board of Directors**" shall mean the Board of Directors of the Company, as constituted from time to time;
- d. "**Company**" means Kay Jay Forgings Limited;
- e. "**Listing Regulations**" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued there under, including any statutory modifications or reenactments thereof for the time being in force;
- f. "**Policy**" mean this Archival Policy ; and
- g. "**Website**" means the website of the Company i.e., [www.kayjayforgings.com](http://www.kayjayforgings.com).

Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Laws.

#### **4. ARCHIVAL MECHANISM**

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- a. All the events or information which have been disclosed by the Company to the stock exchange(s) under regulation 30 (8) of the Listing Regulations will be hosted by the Company on its Website for a minimum period of 5 (five) years or such other time period as may be required under the Applicable Laws, and thereafter the same shall be archived so as to be available for retrieval for a further period of 3 (three) years by storing the same on a suitable media using appropriate technology.
- b. Presentations and audio-video recordings/ transcripts in relation to post earnings or quarterly calls shall be hosted on the Website of the Company for a minimum period of 5 (five) years or such other time period as may be required under the Applicable Laws, and shall thereafter be archived as per this Policy so as to be available for retrieval for a further period of 3 (three) years by storing the same on a suitable media using appropriate technology.
- c. Any other information, event or documents as may be required under the Applicable Laws, rules, regulations, directives or order of the regulatory and statutory authorities as may be applicable to the Company shall be hosted on the Website of the Company for such minimum period as may be required under the Applicable Laws, rules, regulations, directives or order of the regulatory and statutory authorities and thereafter may be archived, if required, for such period as may be required under the Applicable Laws by storing the same on a suitable media using appropriate technology.

- d. The Website of the Company shall be periodically reviewed in order to ensure updation of information and documents on the Website.
- e. These archives shall be made available on a written request made to the Company Secretary and compliance officer of the Company.
- f. As per regulation 9, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode.

## **5. DISSEMINATION OF THE POLICY**

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This Policy shall be hosted on the Website of the Company.

## **6. REVIEW AND AMENDMENT**

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- a. Notwithstanding anything contained in this Policy, the Company shall ensure compliance with additional requirements as may be prescribed under Applicable Laws, either existing or arising out of any amendment to such Applicable Laws or otherwise and applicable to the Company from time to time.
- b. The Policy would be reviewed from time to time. In case there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended, if deemed necessary, with due approval from the Board of Directors.
- c. This Policy is intended to be in conformity with the Listing Regulations and the Act as on the date of its adoption. However, if due to subsequent modifications in the Listing Regulations, the Act or any other Applicable Laws, a provision of this Policy or any part thereof becomes inconsistent with the Listing Regulations, the Act, or any other Applicable Laws, then the provisions of such Listing Regulations, the Act, laws, or such Applicable Laws as modified, shall prevail.

## **7. EFFECTIVE DATE**

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The Policy shall be effective from the date of listing the equity shares the Company on Stock Exchanges.

Date: August 18, 2025

Place: Ludhiana

*Note: Approved in the meeting dated August 18, 2025*

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