

RECORDS MANAGEMENT POLICY

[Pursuant to Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

1. PURPOSE

The Board of Directors (“the Board”) of JTPM Atsali Limited (“the Company”), has adopted this Records Management Policy (“the Policy”) to establish the framework needed for effective preservation/ maintenance of documents and records of the Company required to be maintained under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”).

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

2. OBJECTIVE

The objective of this Policy is to ensure that the documents / records required to be prepared and disclosed to the stock exchanges pursuant to the Listing Regulations (“the Listing Records”), whether physically or in electronic form be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

Further, if any other applicable law requires the preservation of any of these Listing Records for a longer period or permanently, then those shall be preserved / maintained accordingly.

3. POLICY FOR PRESERVATION / MAINTENANCE

The Listing Records created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in year wise folders.

Further, the safety of the Listing Records in electronic form is to be achieved as per the relevant IT policy of the Company whereas the physical record shall be in the custody of the Company Secretary or a record management company as may be approved by the Board from time to time.

The Listing Records shall be preserved for a minimum period of 8 years from the date of completion of relevant transaction and thereafter may be destroyed after due scrutiny by the Managing Director and / or any other Director and / or the Company Secretary if those records are not required for, or were subject matter of any pending litigation/ dispute.

4. PLACE OF PRESERVATION / MAINTENANCE

The Listing Records shall be preserved / maintained at the Registered Office of the Company or a record management company as may be approved by the Board from time to time, unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

5. RIGHT TO ACCESS / RETRIEVE

The Company Secretary and his/her subordinate (direct report) in the Secretarial Department, shall have the right of access to the Listing Records.

6. ROLE OF REGISTRAR AND TRANSFER AGENT

The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained with them. The Company shall obtain an annual undertaking from the Registrar and Transfer Agent of the Company in this regard as per the format Annexed hereto.

7. VERIFICATION OF RECORDS

The Company Secretary or any other person duly authorised by the Board shall verify the Listing Records annually by visiting Registrar and Transfer Agent's office and checking the records maintained by them.

8. PERSON RESPONSIBLE

The Company Secretary or any other officer authorised by the Board shall be responsible for ensuring compliance under this Policy.

9. AMENDMENT

This Policy shall not be amended unless the amendment is approved by the Board of Directors or unless such amendment is required pursuant to change in the applicable law.

Title: Records Management Policy	Approved By: The Board Date: November 14, 2018
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