

JAGATJIT AGRI ENGINEERING LIMITED

(formerly Jagatjit Agri Engineering Private Limited and Jagatjit Agri India Private Limited)

CONTENT ARCHIVING POLICY & WEB ARCHIVAL OF WEBSITE DISCLOSURES

[Pursuant to Regulation 9 & 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

JAGATJIT AGRI ENGINEERING LIMITED

CIN: U29300PB2020PLC051718

Registered Office: LUDHIANA MALERKOTLA ROAD, DEHLON, LUDHIANA, PUNJAB- INDIA-141118

JAGTJIT AGRI ENGINEERING LIMITED

CONTENT ARCHIVAL POLICY

1. BACKGROUND

- a) Jagatjit Agri Engineering Limited ("Company") being proposed to be listed post completion of its Initial Public Offering is required to comply with the provisions of the Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time ("SEBI Listing Regulations") and the other guidelines issued by the SEBI from time to time in this regard.
- b) The website of the Company contains information on its business and operations for information and awareness of stakeholders. The website is regularly updated and certain information and documents are archived periodically.
- c) As per Regulation 9 of the SEBI Listing Regulations, the Company has to prepare an archival policy ("Policy") to provide guidelines for preservation and archival of records and documents. Pursuant to Regulation 30(8), and Regulation 46 of the SEBI Listing Regulations, require all listed companies to host on its website various information required under the SEBI Listing Regulations and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website. The Policy shall be disclosed on the Company's website <https://jagatjitgroup.com/>
- d) The Board of Directors of the Company, at its meeting held on September 15, 2026 approved the Policy. The Policy will be effective from September 15, 2026

2. DEFINITIONS

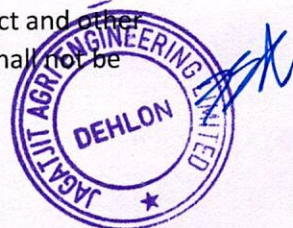
"Board of Directors" or "the Board" means the Board of Directors of the Company, as constituted from time to time.

"Material Events" means events as specified in Schedule III to the SEBI Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity's website.

3. OBJECTIVES OF THE POLICY

The major objectives of the Policy are:

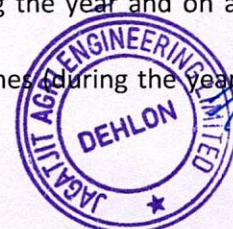
- a) Identification of information, documents, events, etc. which are required to be disclosed on the website of the Company;
- b) Ensuring that all the information is disclosed at the relevant time and with proper link and to maintain unanimity every time;
- c) Ensuring that all the information, documents, events disclosed on the website of the Company, unless otherwise specified in the Act, shall remain on the website for the period of five (5) years from the date of disclosure of such information, documents and events.
- d) Ensuring that after completion of five (5) years from date of disclosure of the respective documents/information/events, same should be moved to the respective archives folder on the Website of the Company.
- e) Ensuring that documents/information, events which are required to be uploaded on the Website for a particular period, shall be deleted after the due date without movement in archives folder.
- f) Ensuring that certain documents like policies of the Company, Codes of Conduct and other documents which are required to be continuously displayed on the Website, shall not be archived.



- I. **ARCHIVAL PROCESS** As per 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 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 Company may keep such documents in electronic mode.
- II. All events and information identified as material as per Regulation 30 of SEBI Listing Regulations on disclosure of material events/ information and communicated to the stock exchanges shall be hosted on the website of the Company for a minimum period of five years and thereafter shall be archived. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the company secretary and compliance officer of the Company.
- III. This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.
- IV. Depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company's Website for a longer period of time as decided by the Board from time to time.
- V. Disclosed information after more than five years, shall be kept in the archives of the Company for a period as decided by the Board or as per the relevant provisions of law. Anyone intending to review those disclosed archived information may write to compliance officer of the Company.
- VI. In case the aforesaid disclosures are required by any applicable law or regulation or competent authority to be hosted for a period longer than that mentioned above, such disclosures shall be hosted on the website of the Company for such longer period, as approved by the Board from time to time.

4. The following information shall be uploaded on the website and shall be updated within two working days from the date of occurrence of change:

1. Details of Company's business;
 - a) Memorandum of Association and Articles of Association;
 - b) Brief profile of board of directors including directorship and full-time positions in body corporates;
2. Terms and conditions of appointment of Independent Directors;
3. Composition of various committees of Board of Directors;
4. Code of conduct of Board of Directors and Senior Management Personnel;
5. Details of establishment of Vigil Mechanism/ Whistle Blower policy;
6. Criteria of making payments to non-executive directors, if the same has not been disclosed in annual report;
7. Policy on dealing with related party transactions;
8. Policy for determining 'material' subsidiaries;
9. Details of familiarization programmes imparted to Independent Directors including the following details: -
 - a) number of programmes attended by independent directors (during the year and on a cumulative basis till date);
 - b) number of hours spent by independent directors in such programmes during the year and on cumulative basis till date); and



- c) other relevant details.
- 10. Email address for grievance redressal and other relevant details.
- 11. Contact information of the designated officials who are responsible for assisting and handling investor grievances.
- 12. Financial information including:
 - a) notice of meeting of the Board of Directors where financial results shall be discussed.
 - b) financial results, on conclusion of the meeting of the Board of Directors where the financial results were approved.
 - c) complete copy of the annual report including balance sheet, profit and loss account, director's report, corporate governance report etc.;
- 13. Shareholding pattern.
- 14. Details of agreements entered into with the media companies and/or their associates, etc.;
- 15. Schedule of analyst or institutional investor meet at least two working days in advance (excluding the date of the intimation and date of the meet)
- 16. Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means in the following manner:
 - a) The audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;
 - b) the video recordings, if any, shall be made available on the website within forty-eight hours from the conclusion of such calls;
 - c) the transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls;

Provided that-

- a) The information under sub-clause (i) and (ii) of this clause shall be hosted on the website of the listed entity for a minimum period of two years and thereafter as per the preservation policy of the listed entity in terms of clause (b) of regulation 9.
- b) The information under sub-clause (iii) of this clause shall be hosted on the website of the listed entity for a minimum period of five years and preserved in accordance with clause (b) of regulation 9.

New name and the old name of the Company, for a continuous period of one year, from the date of the last name change;

- 17. Items in sub-regulation (1) of regulation 47.
- 18. With effect from October 1, 2018, all credit ratings obtained by the entity for all its outstanding instruments, updated immediately as and when there is any revision in any of the ratings.
- 19. Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year, uploaded at least 21 days prior to the date of the annual general meeting which has been called to inter alia consider accounts of that financial year:

Provided that a listed entity, which has a subsidiary incorporated outside India—

- a) where such subsidiary is statutorily required to prepare consolidated financial statement under any law of the country of its incorporation, the requirement of this



proviso shall be met if consolidated financial statement of such subsidiary is placed on the website of the listed entity;

- b) where such subsidiary is not required to get its financial statement audited under any law of the country of its incorporation and which does not get such financial statement audited, the holding Indian listed entity may place such unaudited financial statement on its website and where such financial statement is in a language other than English, a translated copy of the financial statement in English shall also be placed on the website;

20. secretarial compliance report as per sub-regulation (2) of regulation 24A of SEBI Listing Regulations;
21. disclosure of the policy for determination of materiality of events or information required under clause (ii), sub-regulation (4) of regulation 30 of SEBI Listing Regulations;
22. disclosure of contact details of key managerial personnel who are authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) as required under sub regulation (5) of regulation 30 of the SEBI Listing Regulations;
23. disclosures under sub-regulation (8) of regulation 30 of the SEBI Listing Regulations;
24. statements of deviation(s) or variation(s) as specified in regulation 32 of the SEBI Listing Regulations
25. dividend distribution policy by listed entities based on market capitalization as specified in sub-regulation (1) of regulation 43A of SEBI Listing Regulations;
26. annual return as provided under section 92 of the Companies Act, 2013 and therules made thereunder.

- a. Employee Benefit Scheme Documents, excluding commercial secrets and such other information that would affect competitive position of the listed entity, framed in terms of the provisions of Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2011:

Provided that redaction of information under clause (29.1) above from the Employee Benefit Scheme document shall be approved by the board of directors of the listed entity and shall be in compliance with guidelines as may be specified by the Board:

Provided that for the purpose of compliance with this sub-regulation, the listed entity may provide the exact link to the webpage of each of the recognized stock exchanges where such information has already been made available by the listed entity.

The Company shall ensure that the contents of the website are correct.

The Company shall update any change in the content of its website within two working days from the date of such change in content.

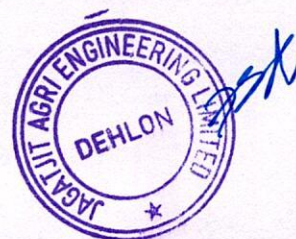
27. Any other information as required to be disclosed on the website of the Company as per the requirement of Regulation 46 of the SEBI LODR Regulations.

5. The following information shall be uploaded on the website as soon as it is disclosed to Stock Exchanges and shall be archived after a period of five years:

1. Acquisition(s) (including agreement to acquire), scheme of arrangement (amalgamation/merger/demerger/restructuring), or sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in associate company of the Company or any other restructuring.



2. Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
3. New Ratings or Revision in rating(s);
4. Outcome of meetings of the Board of Directors: The Listed Entity shall disclose to the Exchange(s) the outcome of meetings of the board of Directors held to consider the following:
 - a. Dividends recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched.
 - b. Any cancellation of dividend with reasons thereof.
 - c. Board of Director's decision on buyback of securities.
 - d. Board of Directors' decision of fund raising proposed to be undertaken including by way of issue of securities (excluding security receipts, securitized debt instruments or money market instruments regulated by the Reserve Bank of India), through further public offer, rights issue, American Depository Receipts/ Global Depository Receipts/ Foreign Currency Convertible Bonds, qualified institutions placement, debt issue, preferential issue or any other method;
 - e. Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched.
 - f. Reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to.
 - g. Short particulars of any other alterations of capital, including calls.
 - h. Financial results.
 - i. Board of Directors' decision on voluntary delisting from stock exchange(s).
5. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the Company), agreement(s)/treaty(ies)/contract(s) with media companies which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
 - a. Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreementsProvided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.



6. Fraud/defaults by the promoter, director or key managerial personnel, senior management or subsidiary or by Company or arrest of key managerial personnel, senior management, promoter or director of the Company, whether occurred within India or abroad;
7. Change in Directors, Key Managerial Personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Statutory Auditor and Compliance Officer.
8. In case of resignation or removal of the auditor of the Company, detailed reasons for resignation of auditor, as given by the said auditor, or for removal of auditor, as given by the Company, respectively.
9. In case of resignation of an Independent Director of the Company:
 - a) The letter of resignation along with detailed reasons for the resignation
 - b) Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any.
 - c) Detailed reasons for the resignation of independent directors as given by the said director.
 - d) Confirmation from the independent director confirming that there is no other material reasons other than those provided under clause 9(a) (b) and (c) above.
10. In case of resignation of key managerial personnel, senior management, Compliance Officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the Company within seven days from the date that such resignation comes into effect.
11. In case the Managing Director or Chief Executive Officer of the Company was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).
12. Appointment or discontinuation of registrar to an issue and share transfer agent.
13. Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details:
 - a) Decision to initiate resolution of loans/borrowings;
 - b) Signing of Inter-Creditors Agreement (ICA) by lenders;
 - c) Finalization of Resolution Plan;
 - d) Implementation of Resolution Plan;
 - e) Salient features, not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders.
 - f) One-time settlement with a bank.
 - g) Winding-up petition filed by any party/creditors.
 - h) Issuance of notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company
 - i) Proceedings of annual and extraordinary general meetings of the Company.
 - j) Amendments to memorandum and articles of association of Company, in brief.
 - k) Schedule of analyst or institutional investor meet and presentations on financial results made by the Company to analysts or institutional investors and audio or video

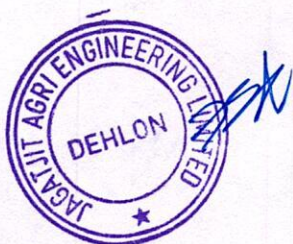


recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means.

14. The following events in relation to the corporate insolvency resolution process ("CIRP") of a listed corporate debtor under the Insolvency and Bankruptcy Code, 2016 (Insolvency Code):

- a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default.
- b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default.
- c) Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable.
- d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code.
- e) List of creditors as required to be displayed by the corporate debtor under Regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016.
- f) Appointment/ replacement of the Resolution Professional.
- g) Prior or post-facto intimation of the meetings of Committee of Creditors.
- h) Brief particulars of invitation of resolution plans under Section 25(2)(h) of Insolvency Code in the Form specified under Regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016.
- i) Number of resolution plans received by Resolution Professional.
- j) Filing of resolution plan with the Tribunal.
- k) Approval of resolution plan by the Tribunal or rejection, if applicable.
- l) Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including details such as:
 - a. Pre and Post net-worth of the company.
 - b. Details of assets of the company post CIRP.
 - c. Details of securities continuing to be imposed on the companies' assets.
 - d. Other material liabilities imposed on the company.
 - e. Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities.
 - f. Details of funds infused in the company, creditors paid-off.
 - g. Additional liability on the incoming investors due to the transaction, source of such funding etc.
 - h. Impact on the investor – revised P/E, RONW ratios etc.
 - i. Names of the new promoters, key managerial persons(s), if any and their past experience in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control;
 - j. Brief description of business strategy.
 - k. Any other material information not involving commercial secrets.
 - l. Proposed steps to be taken by the incoming investor/acquirer for achieving the minimum public shareholding.
 - m. Quarterly disclosure of the status of achieving the minimum public shareholding.
 - n. The details as to the delisting plans, if any approved in the resolution plan.

15. In case of initiation of forensic audit, (by whatever name called), the following information:



- a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available.
 - b) Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the Company along with comments of the management, if any.
16. Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a listed entity, in relation to any event or information which is material for the listed entity in terms of regulation 30 of these regulations and is not already made available in the public domain by the Company.
 17. Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company.
 18. Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company.
 19. Voluntary revision of financial statements or the report of the Board of Directors of the Company under section 131 of the Companies Act, 2013.
 20. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
 21. Any of the following events pertaining to the listed entity: (a) arrangements for strategic, technical, manufacturing, or marketing tie up; or (b) adoption of new line(s) of business; or (c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal).).
 22. Capacity addition or product launch.
 23. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/ contracts not in the normal course of business.
 24. Agreements (viz. loan agreement(s) or any other agreement (s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
 25. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
 26. Effect(s) arising out of change in the regulatory framework applicable to the Company.
 27. Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.
 28. Frauds or defaults by employees of the listed entity which has or may have an impact on the Company;
 29. Options to purchase securities including any ESOP/ESPS schemes.
 30. Giving of guarantees or indemnity or becoming a surety for any third party.
 31. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
 32. Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority;
 33. Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities;



34. Any other disclosures of event/information as specified by SEBI from time to time or as required to be disclosed as per the requirement of Regulation 30 of the SEBI Listing Regulations.
35. Further, the backup of the abovementioned information and/or documents which when removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

AMENDMENTS

The Company may review and revise the Policy from time to time. The Board of Directors of the Company shall have the right to review or amend the policy from time to time so that the policy remains complied with applicable legal requirements.

The Board shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. In case if any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and SEBI Listing Regulations ("Statutory Provisions") then the Statutory Provisions shall prevail over the Policy to that extent and the Policy shall be deemed to have been amended so as to be read in consonance with the Statutory Provisions. As this Policy is pursuant to the applicable laws, if any change to applicable laws or interpretation thereof necessitates any change to the Policy, this Policy shall be read so as to accommodate the changes.

OFFICER RESPONSIBLE

The Company Secretary and compliance officer or any other person authorized by the Board of Directors shall be responsible for ensuring overall compliance of this Policy.

DISCLOSURE ON WEBSITE

The policy shall be continuously hosted on the Website of the Company after the approval of the Board of Directors and after every amendment/updating thereof.

DESTRUCTION OF DOCUMENT

After the expiry of the archival period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors. This applies to both physical and electronic documents.

