PNC CAPITAL TRUST LTD.

POLICYON DOCUMENT PRESERVATION & ARCHIVAL OF DOCUMENTS

Statutory Mandate & Objective

The policy on preservation and archival of documents is mandate by the provisions of Chapter III of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015("LODR''). With this policy, the Company intends to safeguard significant documents and preserve them to ensure durability of documents including documents in electronic form.

SCOPE

These guidelines will be valid for determining preservation period for commercial and legal records; and will be applicable to all locations of the Company.

RESPONSIBILITY

The departmental concerned will be responsible for maintenance, preservation and destruction of records pertaining to the respective Department.

MODE OF PRESEVATION

Records/documents may be preserved either physically or inelectronics form.

DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed year or according to need by the respective and action taken to destroy those records which are due for disposal.

PRESERVATION PERIOD

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

AMENDMENT & REVIEW OF THE POLICY

Any changes in the policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this policy or the entire Policy, at any times, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In any circumstance,where the terms of this Policy differ from ant existing or newly enacted law,rule,regulation or standard governing the company, the law ,rule,regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to law,rule,regulation or standard.

DOCUMENT PRESERVATION SCHEDULE PROCESS;-

CORPORATE RECORDS

A) Permanent Preservation:

Indicative List

A. PERMANET PRESERVATION:

a) Common Seal,
b)Minutes books of Board, General Meetings and Committee Meetings,
c) Statutory Registers,
d)License and Permissions,
e) Statutory Forms and disclosures except for routine compliance,
f) Scrutinizers report,
g) Register of Members and
h)Index of Members.

B. TEMPORARY PRESERVATION UPTO 8 YEARS

a) Annual Returns,
b) Board Agenda and supporting documents,
c) Attendance Register,
d)Office copies of Notice of General Meeting and related papers,
e) Office copies of Notice of Board Meeting/Committee Meeting, Notes on Agenda and other related papers,
f) All notices pertaining to disclosure of interest of directors,
g) Instrument creating a charge or modification,
h) Books of accounts,financial statement etc.- 8 years from the end of Financial Year or complete of assessment under Income Tax whichever is later.

B) Any other documents required to be preserved for 8 years under any law/statute.

C) Other Documents under other laws may be stored and preserved in physical form/electronic form , after the completion of assessment under Income Tax whichever is later.

Electronics Documents including email retention and back up

Electronics Mail:

1) All e-mail- from internal sources to be deleted after they cease to be of current use.

2) Employees should keep emails related to current business issues.

3) All email would be archived for 5 years on the server, post which time the email can be permanently deleted.

4) Employees will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the respective Department heads.

5) Employees will take care not to send information to outsiders.

Web pages Files

1) All such events/information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.

2) After the initial period of 5 years, documents/information(except documents of permanent nature) shall be archived further period of 3 years.

3) Documents of permanent nature,uploaded on the company's website,shall be archived.