

# **JINDAL WORLDWIDE LIMITED**

## **Preservation of Documents & Archival Policy**

*(Reviewed/Amended in Board Meeting dated 1<sup>st</sup> April, 2024)*

{Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereof}

## **1. LEGAL FRAMEWORK:**

The Securities and Exchange Board of India (SEBI) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") which shall be applicable to all listed entity with effect from 1st December, 2015.

Therefore, in pursuance to the Regulation 9 of the Listing Regulations the Board of Directors of Jindal Worldwide Limited ("the Company") has adopted a policy aiming at preservation of documents / records maintained by the Company either in physical or electronic mode. The Policy shall be called Preservation of Documents & Archival Policy (hereinafter referred to as "the Policy").

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents approved by its board of directors, classifying them in at least two categories as follows:

- (a) documents whose preservation shall be permanent in nature;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode

### **Further, Regulation 30 (8) of the SEBI (LODR) Regulations, 2015 states that:**

*"The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, 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."*

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time. Accordingly this policy has been framed, keeping in view particularly the requirements of the SEBI (LODR) Regulations, 2015 and the provisions of the Companies Act, 2013.

## **2. OBJECTIVE:**

The purpose of the Policy is to provide guidance to employees of the Company on maintenance, preservation and disposal of the documents maintained by the Company.

## **3. CLASSIFICATION:**

The preservation of Documents shall be done in the following manner:

- a.) Documents whose preservation shall be permanent in nature;
- b.) Documents with preservation period of not less than eight years after completion of the relevant transactions

An indicative list of the Documents and the timeframe of their preservation is provided in Annexure I.

## **4. MODE OF PRESERVATION:**

The Documents may be preserved in

- a. physical form or

b. Electronic Form.

The Authorized Person is expected to observe the compliance of requirements of Applicable Law. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

**5. DISPOSAL OF DOCUMENTS:**

The documents shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the documents are stored, after the prior specific approval of the Managing Director or Whole Time Director of the Company or any other person authorized by the Board of Directors from time to time and as per Applicable Law pursuant to which the documents have been preserved. The details of the documents destroyed by the company shall be recorded in the Register of Disposal of Records to be kept by Employees who are disposing of the document in the format prescribed in **Annexure II**.

**ARCHIVAL POLICY:**

- In line with the Company's Policy on Determination of Materiality of Events and as per the SEBI (LODR) Regulations, 2015, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years
- Disclosed Information which is more than five years old will be archived and moved to the location or place under – "Historic Material Events / Information". The events / information so archived under "Historic Material Events / Information" shall be preserved for a further period of three years or till the time such events or information are resolved or closed, whichever is later. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of documents.
- In addition to maintaining the records on the website, the Company shall also maintain the physical copies of such disclosure made to the stock exchanges(s) which shall be preserved for the period as per the Company's Policy on Preservation of Documents

**6. REVIEW AND DISCLOSURES:**

The Board of Directors shall have the right to review, modify, amend or change any or all clauses of this Policy in accordance with the guidelines as may be issued by Securities Exchange Board of India or such other regulatory authority as may be authorized, from time to time. Any changes or revisions to the policy will be communicated to shareholders in a timely manner.

The Company shall make appropriate disclosures in compliance with the provisions of the Listing Regulations, in particular the disclosures required to be made on the website of the Company.

The policy will be available on the Company's website i.e [www.jindaltextiles.com](http://www.jindaltextiles.com).

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# Annexure – I

## Indicative list

Sr. No.	Particular	
<b>A.</b>	<b>PERMANENT PRESERVATION</b>	
	a)	The Memorandum and Articles of Association of Company
	b)	Certificate of Incorporation and subsequently amended certificates
	c)	Minutes books of Board, General Meetings and Committee Meetings
	d)	Statutory Registers
	e)	License and Permissions
	f)	Statutory Forms and disclosures except for routine compliance
	g)	Scrutinizers' Reports
	h)	Policies and codes of the Company
<b>B.</b>	<b>PRESERVATION FOR MINIMUM 8 YEARS:</b>	
	a)	Annual Returns
	b)	Annual Reports
	c)	Notice, Agenda papers and supporting documents of Board / Committee Meetings
	d)	Notice, Agenda papers and supporting documents of General Meetings
	e)	Attendance Registers
	f)	Circular Resolutions
	g)	All notices pertaining to disclosure of interest of directors
	h)	Books of accounts, financial statements etc.
	i)	Non Mandatory Registers
<b>C.</b>	<b>OTHERS:</b>	
		As per applicable law

**Annexure – II**

**Register of Disposal of Records**

<b>Sr. No.</b>	<b>Particulars of documents destroyed</b>	<b>Date and mode of destruction</b>	<b>Initials of the Authorized Person in whose presence the document is destroyed</b>