

# **JUPITER WAGONS LIMITED**

CIN: L28100MP1979PLC049375

**Policy for Preservation of Documents** 

### 1. Preamble

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**") mandates each publicly listed company to develop a policy regarding the preservation of company documents, subject to approval by the Board of Directors.

Thus, this policy ("**Policy**") is framed with an objective of classifying various records, registers, returns for the purpose of such maintenance and preservation as prescribed.

### 2. Effective Date

This policy shall be effective from the date of approval from the Board, unless stated otherwise.

### 3. Documents

- a) "Documents" refers to all papers, records, writings, communications, including agreements, sale / conveyance deeds, licences, judgments, orders, approvals, registration certificates, building plans, vouchers, etc. generated or received by JWL in the course of its business either in physical form or in electronic form.
- b) Documents generated or received in "electronic form" would include but not limited to emails and attachments, scanned papers, word documents, presentations, spreadsheets, databases, picture / graphic files, computer generated faxes, calendars, network access files and internet usage files, etc.

### 4. Preservation of documents

The Company shall classify documents 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.

# 5. Roles and responsibilities

The designated Functional/Departmental heads within the Company bear the responsibility for the maintenance and preservation of documents related to the specific areas falling under their purview, as outlined in this Policy. In the event that an authorized individual submits their resignation or undergoes a transfer from one Company location to another, said individual must, before the resignation or transfer takes effect, transfer all pertinent documents (whether in electronic form or otherwise) in their possession as per this Policy to their successor. Additionally, any relevant passwords, lock and key, and devices used for storing such documents should also be handed over.

## 6. Disposal of documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the Appendix-I may be destroyed. The departmental/functional head may direct employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix-I.

The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents clearly specifying the Particulars of documents destroyed and Date and mode of destruction with the initials of authorized person.

### 7. Suspension of documents disposal in the event of litigation/claims

If the Company receives any notice requesting documents from statutory authorities or if any litigation is initiated involving the Company, the disposal of documents related to the subject matter of such notice or litigation shall be put on hold until the matter is settled, resolved, or disposed of. The authorized person overseeing the relevant documents is responsible for informing all pertinent employees within the Company about the suspension of further document disposal during this period.

### 8. Review of the Policy

The Board will review this Policy and make revisions as may be required to comply with various laws and compliances from time to time. The decision of the Board in this respect shall be final and binding.

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#### **Document Preservation Schedule**

#	Particulars	Period		
	To be maintained permanently			
1	Incorporation documents	Permanent		
2	Memorandum and articles of association	Permanent		
3	Register of members along with the index	Permanent		
4	Register of directors and key managerial personnel	Permanent		
5	Register of loans, guarantees, security and acquisition	Permanent		
6	Minutes of Board Meeting	Permanent		
7	Minutes of Annual General Meetings	Permanent		
8	Minutes of various committees' minutes	Permanent		
9	Statutory register	Permanent		
10	Index of members	Permanent		
11	Register of members	Permanent		
12	License certificates and permits	Permanent		
13	Management policies and procedures	Permanent		
14	Scrutinizer reports	Permanent		
15	Statutory forms	Permanent		
16	Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other regulatory authority	Permanent		
To be maintained at least for 8 years				
17	Annual returns	8 years from the date filling MCA		
18	Annual financials	8 years from the date filling MCA		
19	Attendance registers of various meetings	8 years		
20	Agenda papers of Board meetings/Committee meetings	8 years		
21	Notice of Board / Committee meetings	8 years		
22	Notice of general meetings	8 years		
23	Other related documents	8 years		

In addition to the documents mentioned in sub-clause (i) and (ii) above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.

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### The format of the register of Documents disposed / destroyed:

Particulars of document along with provision of applicable law	Date and mode of destruction	Initials of the authorised person