

**Policy for Preservation of Documents  
Of  
Jaiprakash Associates Limited**



## **1. PREFACE**

- 1.1. This “Policy for Preservation of Documents” shall hereinafter be called “the Policy” of Jaiprakash Associates Limited (hereinafter called “the Company”).
- 1.2. The Policy has been framed pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter called “the Listing Regulations”) which requires that every listed entity shall have a Policy for Preservation of Documents duly approved by the Board and will become effective from 1<sup>st</sup> December, 2015.
- 1.3. The Policy has been approved by the Board of Directors of the Company on 14<sup>th</sup> November, 2015.
- 1.4. The aim of the policy is to establish guidelines for management of Company’s records & its retention and archival by Jaiprakash Associates Limited.

## **2. PURPOSE**

The objective of the Policy is to ensure that necessary records and documents are maintained and preserved and such documents that need to be discarded are extinguished, truncated and/or destroyed at appropriate time and manner and in compliance of Listing Regulations, the Companies Act, 2013 and such other laws that contain such provisions applicable to the Company. All the Records received or created or maintained by the Company shall be managed and retained in terms of this Policy.

## **3. DOCUMENTS**

Documents refers to all types of records, whether physical or electronic, including document(s), agreement(s), writing(s), paper(s), communication(s), deed(s), approval(s), license(s), registration(s), permission(s), judgment(s), order(s), drawing(s), plan(s), statutory record(s), created or received by the Company and any other document(s)/ record(s) required under or in compliance with the Acts, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time. The retention period apply to all Records at Company’s various locations such as divisions, Units, off-site locations and storage in computers, laptops or cloud storage.

## **4. SCOPE OF POLICY**

The Policy applies to all types of records, whether physical or electronic, including but not limited to email and attachments, documents scanned into PDF, jpg or other formats of images, Power Point presentations, spreadsheets, Word documents, databases, picture and graphic files, computer generated faxes, calendars, network access files and internal usage files, programs and software.

## **5. MAINTENANCE OF DOCUMENTS**

5.1. Records shall be preserved under four categories:

- (a) Permanent in nature;
- (b) Specified period – not less than eight years;
- (c) As mandated under the applicable laws or business needs; and
- (d) Records or documents not covered in the policy such as ordinary correspondence and normal e-mails should not be retained for more than one year.

Minimum retention period of the record shall be as mandated in the relevant applicable statutes, laws, regulations and guidelines as amended from time to time and as per business needs.

5.2. A record, on the basis of frequency of its need, may be kept at an accessible storage place, created or erected for such purpose or in the record room and may be shifted / interchanged on a regular basis with the permission of the concerned Head of the Department / Department/ Functional Head. The designated Incharge of the Records shall maintain lists of records maintained and kept in the record room. Lists of the record kept at accessible area outside record room shall be maintained by persons given the custody of such record.

5.3. All records must be properly classified and labeled accordingly, indexed and stored in the record room maintained by the Company for this purpose.

5.4. The Head of each Department shall designate an employee in the department to be in charge of the Records whether kept outside the record room (hereinafter “Records-in-Charge”, who shall overlook and ensure that maintenance and preservation of record is in compliance with this Policy.

## **6. DISPOSAL OF DOCUMENTS**

A register of particulars of destruction of records/documents shall be maintained and shall be kept in the custody of a person designated by respective Department/ Functional Heads in respect of records which are under his custody. Upon destruction of any record/document, requisite particulars shall be entered in the register and will be counter-signed by atleast one Whole-time Director and by the respective Department/ Functional Head.

## **7. PRESERVATION OF RECORDS**

7.1. All documents as may be required under the relevant statute, laws, regulations, namely but not limited to documents pertaining to certificate of incorporation, certificate of commencement of business, forms and returns

filed under various statutes, laws, regulations, rules, notifications or statutory orders and directions as may be notified from time to time, documents evidencing registrations, licenses, approvals, permissions, clearances, permanent account number (PAN card) under the Income Tax Act, 1961, title deeds, court orders, sale / conveyance deeds, power of attorney(ies), opinions, databases in ERP, drawings, plans, agreements, certificates, statutory / regulatory approvals, trust deeds, partnership deeds, patents, joint venture agreements, trademarks, copy rights and any amendments thereto shall be preserved permanently.

- 7.2. Minute books containing minutes of proceedings of meetings of the board, its committees, general meetings of members, meeting of class holders, statutory records and registers maintained under the Companies Act shall be preserved permanently.

Agenda notes, notices, attendance records for the aforesaid meetings shall be maintained in good and proper condition and order for a period of at least eight years.

- 7.3. All books of account, supporting documents, vouchers shall be kept in proper and good physical condition for not less than a period of eight financial years beginning with the financial year to which they relate.
- 7.4. Records relating to Company's assessment under the direct and indirect taxes shall be kept for a period of eight years beginning with the financial year to which they relate.
- 7.5. In addition to the above, all other Records shall be kept for such period as may be specified in the relevant statutes, laws, regulations, guidelines, approvals etc. to which such record relates.
- 7.6. Physical preservations shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorised.
- 7.7. Notwithstanding anything contained in this Policy in case of directions from any statutory / regulatory authorities, tribunals, direct and indirect tax authorities, registrar of companies, court of laws by order in writing, to preserve any of the documents mentioned in 5.1 (b) above then the Company will be bound to preserve such documents for such period beyond the period of 8 years, according to the directions, so received.

## **8. POLICY REVIEW**

- 8.1. This Policy is based on the provisions of the prevalent Acts, rules, guidelines, regulations framed under the various statutes, laws applicable to the Company.

8.2. In case of any modification of existing legislation and/or promulgation / enactment of new law, due to which the respective portion of this policy becomes inconsistent, till such time that the policy is modified and/or amended, such amended provisions would prevail over this Policy.

8.3. This Policy may be amended as and when the need arises to make it consistent with the prevailing provisions of any legislation, statute, circulars, guidelines and notifications and such amended policy shall be placed before the Board of Directors for its approval.

## **9. DISCLOSURE ON WEBSITE**

The above Policy and subsequent amendments thereto shall also be disclosed on the Company's website in line with the aforesaid Regulations.