

ARCHIVAL POLICY

PREFACE

TITLE	ARCHIVAL POLICY
VERSION NUMBER	1.00
EFFECTIVE DATE	02.02.2016
AUTHORISED BY	BOARD OF DIRECTORS
NUMBER OF REVISIONS	NONE

1. BACKGROUND

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) has imposed certain obligations and disclosure requirements on all listed entities. Regulation 9 casts obligations on all listed entities to formulate and put in place a policy for preservation of documents.

Regulation 30(8) requires disclosure of all events or information which has been disclosed under Regulation 30 on the Company’s website for a minimum period of five years and thereafter as per the Archival Policy of the Company.

2. AUTHORIZED PERSONNEL

The Joint Managing Director and/or Compliance Officer shall be responsible for maintaining and implementing the framework under this Policy.

3. OBJECTIVE

The objective of this policy is to have a binding framework for the preservation of documents of JSW Holdings Limited (“Company”) and subsequent archival of such documents, as approved by the Board of Directors of the company, which shall classify them in at least two categories as follows:

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

4. PRESERVATION OF DOCUMENTS

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

A. The documents of a permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. (Annexure A)

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. (Annexure B)

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

After completion of eight years, all such documents shall be preserved permanently in a secured server of the Company.

The company may, as it deems fit and possible from time to time, maintain above mentioned documents in electronic form to the extent possible.

For ensuring safety of the data hosted on the website of the Company, a back-up of the website shall be taken on regular intervals

5. PLACE OF PRESERVATION

Records shall be preserved / maintained at the Registered Office of the Company unless any law specifically permits to keep them at any other place administratively convenient to the Company.

Records created in physical form may be scanned and maintained in electronic form as well. The electronic communication can be maintained on the Company server in year wise folders, with access restricted to certain sections/ departments to prevent tampering of documents.

Further, the safety of these Records in electronic form is to be achieved as per the relevant IT policy of the Company.

6. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

7. DISPOSAL OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the Joint Managing Director and/or Compliance Officer. Disposal of documents as a normal administrative practice will be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

8. ACCESS/RETRIEVAL

The Authorized Personnel shall have the right of access to the archived documents.

9. DISCLOSURES UNDER REGULATION 30

The Company shall host all the disclosures under Regulation 30 on its website for a minimum period of five years. The disclosures shall be in a non-editable format. After the expiry of five years, all such disclosures may be preserved permanently in a secured server of the

Company and shall be retrievable from the server as and when required.

10. AMENDMENT TO THE POLICY

The Board of Directors is authorised to make appropriate changes to the above policy as it may deem expedient taking into account the law for the time being in force. This policy is subject to review from time to time.

Annexure A

Documents to be preserved permanently

The Company shall preserve the following documents permanently:

Description of the Document	Remarks
i. Certificate of Incorporation	Original and Scanned copies
ii. Certificate of Commencement of Business	Original and Scanned copies
iii. Memorandum & Articles of Association, as amended from time to time	Printed Copies and/or scanned copies
iv. Minutes of the meetings of the Shareholders, Board and Committees	Original signed as per the relevant regulations (physical or electronic)
v. Statutory Registers as applicable under Companies Act, 2013	Physical or Electronic
vi. Licenses/ Registration Certificates issued by various authorities relating to Income Tax, Service Tax, local bodies, Employees Provident Fund, Registrar of Companies.	As far as possible originals shall be preserved except where the same is surrendered to the authorities for getting a new certificate or otherwise. In such cases certified copies or photo copies shall be preserved.
vii. Accounting and other operating manuals as amended from time to time.	Original or copies
viii. Annual Reports	Printed or Photo copies (at least one copy) or scanned copy
ix. Agreements which do not specify any validity period and have permanent force	Original or copies
x. Prospectus, Letters of Offer and other similar documents	Printed or scanned copies
xi. Other documents as may be prescribed under any law for the time being in force to be preserved permanently.	The relevant statutory requirements to be complied with.

Annexure B

Documents to be preserved for not less than eight years

The following documents shall be preserved for a period of not less than eight years.

- i. All books of accounts and related records
- ii. Income Tax Returns, Assessment Orders and other related documents
- iii. Service Tax Records
- iv. Payroll Records
- v. Annual Returns filed under the Companies Act, 1956/2013
- vi. Other Documents as may be prescribed under any law for the time being in force to be preserved for not less than 8 years