

JAGSONPAL SERVICES LIMITED
*(Formerly Known as
Jagsonpal Finance and Leasing Limited)*

ARCHIVAL POLICY

Preface

The Securities and Exchange Board of India (“SEBI”) has mandated listed entities to frame an Archival Policy in accordance with **Regulation 30(8)** read with **Schedule III** and **Regulation 46** of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”).

Further, the Companies Act, 2013 requires companies to preserve statutory records and documents for specified periods.

Accordingly, this Archival Policy (“Policy”) is framed to ensure systematic identification, retention, archival and destruction of records, documents and disclosures of the Company in a compliant, secure and transparent manner.

Objective

The objectives of this Policy are to:

- Ensure compliance with statutory retention requirements under applicable laws;
- Classify documents based on preservation and archival requirements;
- Define timelines and methodology for archival of disclosures hosted on the Company’s website;
- Safeguard Company records against unauthorized access, alteration, destruction or loss;
- Enable timely retrieval of records for regulatory, legal, business or stakeholder needs.

Applicability

This Policy applies to:

- All disclosures, documents and records maintained by the Company under the Companies Act, 2013;
- Disclosures made under SEBI LODR Regulations, including on the Company’s website;
- Physical and electronic records generated by the Company in the course of its operations.

Definitions

“**Archival**” means transfer of records from active use to long-term storage after the completion of the retention period as prescribed.

“**Documents**” include records, files, papers, notices, registers, disclosures, returns, agreements and minutes, maintained in physical or electronic form.

“**Material Events / Information**” shall have the meaning assigned under Regulation 30 of SEBI LODR Regulations.

Classification of Records

1. Records to be preserved permanently

The following documents shall be preserved permanently unless otherwise permitted by law:

- Memorandum and Articles of Association;
- Certificate of Incorporation and changes thereto;
- Statutory registers maintained under the Companies Act, 2013;
- Minutes of Board Meetings, Committee Meetings and General Meetings;
- Annual Reports and financial statements;
- Policies approved by the Board;
- Disclosures of Material Events archived under SEBI LODR.

2. Records to be preserved for a minimum period

Unless a longer period is prescribed under any law, the following records shall be preserved for **not less than 8 (eight) years**:

- Books of accounts and vouchers;
- SEBI disclosures made under Regulation 30 (material events/information);
- Contracts, agreements and legal documents;
- Statutory filings and returns with regulatory authorities;
- Investor complaints and grievance redressal records.

Archival of SEBI Disclosures

- Disclosures of material events or information made under Regulation 30 shall be hosted on the Company’s website for a minimum period of five (5) years.
- After completion of five years, such disclosures shall be archived under the “Archived Disclosures” section of the website.
- Archived disclosures shall remain accessible for reference unless removed in accordance with this Policy and applicable law.

Mode of Preservation

Documents may be preserved:

- In physical form;
- In electronic form with proper back-up, access control and disaster recovery mechanisms.

Electronic records shall be maintained in compliance with applicable information technology and data protection standards.

Destruction of Records

Records which are not required to be preserved permanently and whose retention period has expired may be destroyed with the approval of the designated authority, provided no litigation, inquiry, inspection or investigation is pending or anticipated.

A record of such destruction shall be maintained.

Responsibility

- The **Board of Directors** shall have overall supervision of this Policy.
- The **Company Secretary / Compliance Officer** shall be responsible for the administration, execution, monitoring and updating of the Policy.

Policy Disclosure

This Archival Policy shall be:

- Approved by the Board of Directors;
- Disclosed on the Company's website in accordance with Regulation 46 of SEBI LODR Regulations.

Review and Amendments

The Board of Directors may review and amend this Policy from time to time to align it with:

- Amendments to the Companies Act, 2013;
- Amendments, circulars or clarifications issued by SEBI;
- Best governance practices.
