

ARJUN JEWELLERS LIMITED
CIN: U36100GJ2020PLC111829

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

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1. Introduction

The Corporate records of Arjun Jewellers Limited (the “**Company**”) are important assets of the Company. It is the duty of every employee to keep the records in such a manner that the same is retrievable when needed and maintained in good condition and preserved till such time as mentioned below

It is the Company’s policy to maintain complete, accurate and high-quality records as per the Companies Act, 2013 (“**Act**”) rules made thereunder and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended (“**SEBI Listing Regulations**”) and all other applicable laws (hereinafter referred to as “**Relevant laws**”).

The Board of Directors of the Company is required to formulate a policy for “**Preservation of Documents**” to comply with the requirements of Regulation 9 of SEBI Listing Regulations. Further, Regulation 30(8) of SEBI Listing Regulations requires every listed entity to make available an archival policy on its website. Accordingly, a policy for the preservation of documents and archival policy has been formulated.

2. Definitions

“**Act**” means the Companies Act, 2013 and other applicable Acts to the Company & rules made thereunder.

“**Applicable Law**” means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed.

“**Archive/archiving**” is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit and preserving the historical memory and proof of an activity.

“**Authorized Persons**” means the functional head of the concerned department or any person duly authorized by the Board.

“**Board**” in relation to the Company, means the collective body of the directors of the Company or its Committee.

“**Books of Accounts**” shall mean and include records maintained in respect of—

- (a) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
- (b) all sales and purchases of goods and services by the company;
- (c) the assets and liabilities of the company; and
- (d) the items of cost as may be prescribed under section 148 of the Act in the case of a company which belongs to any class of companies specified under that section;

“**Company**” means Arjun Jewellers Limited;

“**Document(s)**” means all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained, whether maintained in physical or electronic mode under any law or regulation for the time being in force.

“**Electronic Form**” means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other digital form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“SEBI Listing Regulations” mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 including any modifications, clarifications, circulars or re-enactment thereof.

“Maintenance” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged, or destroyed.

“Policy” means this Policy on Preservation of documents and Archival Policy and as may be is amended from time to time.

“Website” means <https://arjunjewellers.in/> or any modification thereof

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the SEBI Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.

3. Purpose and Objective

The objectives and purpose of this Policy is to classify the documents in below two categories:

- documents whose preservation shall be permanent in nature and
- 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.

This policy establishes retention and archival schedules for various data categories defined in this policy and this policy is framed for the purpose of systematic identification, categorization, maintenance, retention, and destruction of documents received or created in the normal course of business.

4. Officers responsible for preservation of documents

The respective Functional/ Departmental heads of the Company shall be responsible for identification, maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. Provision regarding Preservation of Documents

For the purpose of the Policy, the Documents of the Company are classified as follows:

- (a) The list of Documents which shall be permanently preserved is given in Annexure A to this Policy. The Company shall permanently preserve these Documents subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the Documents shall also be preserved permanently by the Company.
- (b) The list of Documents which shall be preserved for a period not less than 8 years after completion of the relevant transaction is given in Annexure B to this Policy. The said Documents shall be preserved subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the Documents shall also be preserved for the said period.

6. Archival

- (a) The Company shall host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company for a period of five years and thereafter the same shall be archived for retrieval for such period as decided by the Chief Executive Officer and/or Managing/Whole-Time Director/Executive Director of the Company. Refer **Annexure C**.

- (b) The documents and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.
- (c) Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- (d) The documents and records may be archived in physical and/or electronic mode and shall be stored in the premises of the Company or with an approved warehousing agency in case of physical documents and on the server of the Company and/ or the server of any third-party vendor/ service provider in case of electronic documents having appropriate security and safety measures.

7. Privacy

It shall be the responsibility of the Authorised Person, to determine how privacy laws shall apply to the Company's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

8. Destruction of Records

The documents which are not required to be maintained and preserved permanently may be destroyed with the approval of either the Chief Financial Officer or the Company Secretary & the Compliance Officer or the relevant functional head

However, the documents which cannot be destroyed without the approval of the Board of Directors of the Company as per the provisions of the Act or Listing Regulations, a prior approval shall be taken for disposal of such documents. Also, proper records of destruction shall be maintained for the documents so destroyed.

9. Review and amendments

In the event of any conflict between the Companies Act, 2013 or the SEBI Listing Regulations or any other statutory enactments and the provisions of this Policy, the Regulations shall prevail over this Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Annexure A

Documents/ Records whose preservation shall be permanent in nature

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (a) Certificate of Incorporation.
- (b) Memorandum and Article of Association.
- (c) Agreements made by the Company with stock exchanges and depositories etc.
- (d) Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (e) Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- (f) Register of directors and Key Managerial Personnel.
- (g) Register of Renewed and Duplicate Share Certificates
- (h) Share Certificate forms and related book and documents as per Rule 7(3) of Companies (Share Capital and Debenture) Rules, 2014
- (i) Register of Charges in Form CHG-7 as per Rule 10(4) of the Companies (Registration of Charges) Rules, 2014
- (j) Register of Members along with the index (Form MGT-1)
- (k) Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities) Form MBP-2.
- (l) Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person) Form MBP-3.
- (m) Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)
- (n) Property Card, Ownership, records issued by government Authority.
- (o) Authorizations/ licenses obtained from any statutory authority.
- (p) Files relating to premises for instance title deeds, lease deeds of owned premises/land and buildings etc and related ledger/register.
- (q) Material agreements/ contracts, which, even if terminated, may have an impact on business.
- (r) Orders/judgement issued by Courts/statutory bodies and other background documents relevant for understanding such Orders
- (s) Register of Allotments of Securities
- (t) Such other records as may be required under any law from time to time.

Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Companies Act, 2013 and/ or SEBI Listing Regulations.

Annexure B

Documents/ Records to be preserved for a minimum period of eight years.

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- (a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- (b) Books of Accounts including work papers and other documents related to the audit including Tax and GST, Accounts Payable/Receivable ledgers, General Ledger, Annual Plans and Budgets.
- (c) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013.
- (d) Register of Deposits as per Companies Act;
- (e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (f) Notices in Form MBP-1 for disclosure of interest under section 184 of Companies Act, 2013 and Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014, received from directors of the Company.
- (g) Instrument creating a charge or modifying a charge, as per Rule 10(4) of the Companies (Registration of Charges) Rules, 2014.
- (h) Changes to the Memorandum and Articles of Association.
- (i) Employment record for the employees of the Company.
- (j) Office Copies of Notices, Register of Postal Ballot, Scrutinizer’s Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- (k) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (l) Documents as are required to be maintained under relevant laws relating to direct and in-direct taxes.
- (m) Marketing documents.
- (n) Press releases.
- (o) Legal documents including but not limited to contracts, legal opinions, orders passed by various courts and tribunals, documents relating to cases pending in any court, tribunal or authority.

- (p) Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition.
- (q) Payroll TDS, PF, ESI return and challans applicable on payroll
- (r) Register of Buy-back of Securities.
- (s) Business / Joint Venture / Sales Purchase Agreement / Loan / Lease Agreements.
- (t) Trademark / Copy Rights / Patents.
- (u) All E-forms Filed with relevant registrar of companies pursuant to provisions of the Companies Act 2013.

Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.

Annexure C

List of Documents available on the website of the Company.

- (a) Basic information about the Company including the details of its businesses;
- (b) All information and/or Documents required to be posted on the website as specified in the Companies Act, 2013 and/or Regulation 46(2)/Regulation 30 of the SEBI (LODR) Regulations, 2015.
- (c) All Documents required to be filed with Stock Exchanges under aforesaid Regulations.
- (d) Any changes in the content shall be updated within 2 working days on the website.
- (e) Schedule of Analyst or Institutional Investor meet, and presentations made by the Company to them.
- (f) The information/Documents provided on the website shall be preserved for a period of five years.