

**DOCUMENT PRESERVATION & ARCHIVAL POLICY
OF
JHARKHAND ROAD PROJECTS IMPLEMENTATION COMPANY LIMITED**

Background and legal framework:

This Document called “Documents Preservation & Archival Policy” (“**Policy**”) as approved and adopted by the Board of Directors (“**Board**”) of the Company deals with the preservation, retention and archival of the corporate records and public disclosures of the Company.

Pursuant to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations 2015, the Company is required to maintain certain types of corporate records for a specified period of time.

There are certain types of records that need to be retained for a specified period of time, as identified below.

- a) **Documents to be preserved permanently:** The documents listed in Schedule-I along with any other documents required legally shall be maintained and preserved permanently by the Company.
- b) **Documents to be preserved for no less than 8 years:** The documents listed in Schedule-II along with any other documents required legally shall be maintained and preserved for no less than 8 years by the Company.

Effective date:

This policy duly approved by the Board of Directors of the Company shall be effective May 16, 2024 until modified or withdrawn.

Authority to make alteration to the policy:

Any director of the Company or the Company Secretary is authorized to make such alteration to this policy as considered appropriate, subject to the approval in board meeting, however, subject to the condition that such alteration must be in accordance with applicable laws, including the provisions of the Companies Act, 2013 as amended and the SEBI Listing Regulations.

This Policy will be reviewed periodically by the Board of Directors of the Company. The Board may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

Mode of Preservation:

Records and documents may be preserved either physically or in electronic form in the custody of the Company, including documents uploaded on Company's websites.

Prohibition of disposal of records in the event of litigation / claims

If an employee or the Company requires that the Company records are relevant to litigation or potential litigation, then these records need to be preserved.

In the event the Company is served with any notice for documents from any statutory authority or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of notice/litigation, etc. shall be prohibited.

Limitation, Review and Amendment:

In the event of any conflict between the provisions of this Policy and of the applicable laws, the provisions of applicable laws shall prevail over this Policy. Any subsequent amendment / modification to the applicable laws shall automatically apply to this Policy.

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SCHEDULE-I

Documents whose preservation shall be permanent in nature:

1. Registration Certificate,
2. Memorandum and Articles of Association of the Company.
3. Affidavit from the subscribers to the memorandum and from person named as the first directors,
4. Statutory Registers required under applicable laws,
5. Audited financial statements,
6. Minutes of Board, Committee and General Meetings,
7. Material agreement and contract,
8. Order, notices, judgements issued by the courts, statutory bodies, regulatory authorities,
9. Any other documents as may be required to be maintained permanently in terms of applicable law(s), maintained and preserved from time to time.

SCHEDULE-II

Documents with preservation period of not less than eight years after completion of relevant transaction:

1. Books of accounts,
2. Annual returns,
3. Personnel documents of the directors and of senior management and KMPs,
4. Insurance policies,
5. All notices pertaining to disclosure of interest of directors,
6. Correspondence with shareholders as well as with the courts, statutory bodies, regulatory authorities,
8. Documents surrendered to the Company,
9. Instrument creating a charge or modification,
10. Photos, videos in digital form