S J Logistics (India) Limited

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

Version	Effective Date	Review Date	Prepared By	Reviewed By	Approved By
1.0	September 02, 2023	September 02, 2023	Secretarial Team	Jeet Shah, Director	Board of Directors
2.0	June 11, 2026	June 11, 2026	Secretarial Team	Jeet Shah, Director	Board of Directors

Limitation and Amendments:

The Board of Directors 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.

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

CONTENT

1. INTRODUCTION

S J Logistics (India) Limited (the "**Company**") has adopted the Preservation of Documents and Archival Policy (the "**Policy**") in accordance with SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and Applicable Laws. This Policy is to establish principles for determining the retention, preservation, and archival of documents and records, ensuring compliance with legal, regulatory, and operational requirements.

2. DEFINITIONS

"Act" means the Companies Act, 2013, together with the rules notified there under, including any statutory modifications or re-enactments thereof for the time being in force.

"Applicable Laws" means any other relevant laws, circulars, regulations, rule as may be amended from time to time.

"**Archival**" means the accumulation/storage of historical records on server/network or at a physical place.

"**Board of Directors**" **or "Board"** means the collective body of the directors of the Company.

"**Concerned Department" or "Department**" means Departments specified in Annexure 1 and Annexure 2 of this policy.

"**Documents**" refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

"Functional Head" means an individual appointed by the Board or designated as per the Company's organizational structure to oversee a specific function or department.

"**SEBI Regulations" or "Regulations**" mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modifications or re-enactments thereof for the time being in force.

"**Preservation" or "Preserve**" means maintenance of Documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

All terms defined herein shall have the same meaning whether used in the singular or plural form, unless the context clearly requires otherwise.

3. PURPOSE

The purpose of this Policy is to ensure the Preservation and Archival of Documents and records of the Company is in compliance with, Regulations, and Applicable Laws.

The Policy aims to:

i. Disclosure of Material Information: As per Regulation 30(8) all disclosures made to the stock exchange shall be hosted on the Company's website for 5 (five) years and thereafter archived for 3 (three) years before disposal.

ii. Document Preservation:
   - Permanent Records (Annexure-1).
   - Records Retained for at least 8 (Eight) Years post-transaction (Annexure-2).

iii. General Retention Guidelines: Documents without a prescribed retention period shall be preserved for a reasonable time based on their relevance.

4. AUTHORITY AND RESPONSIBILITY

The Functional Head of the Concerned Department shall be responsible to maintain and destroy the records according to the time frame prescribed in the Policy.

Each of the Departments is responsible for keeping track of the location and contents of all Documents for which they are responsible.

5. MODE OF PRESERVATION

Documents may be Preserved in physical or electronic form, with external agencies allowed for assistance.

i. Physical Documents should be stored within the relevant Department, and any alternate location must be documented.

ii. Critical Documents will be stored securely and in good condition for long-term or permanent Preservation.

iii. Electronic Documents will be kept on Company systems or secure third-party servers.

Preservation must protect against tampering or alteration, and access will be controlled by the respective Functional Head.

6. DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY

The Company shall maintain a functional website containing:

i. Basic company information.
ii. Information/Documents mandated under the Act, and SEBI Regulations, including those specified in Regulations 30 and 46(2).
iii. Any updated content shall be on the website within 2 (two) working days of changes.

7. DISPOSAL OF REGISTERS/ DOCUMENTS

i. Unless required to be Preserved for a particular purpose like litigation or regulatory directive and upon expiration of the specified period of time for Preservation as per SEBI Regulations and/or Applicable Laws.
ii. The Functional Head of the Concerned Department shall be responsible for taking into account the potential impact on Preservation/destruction of the Documents in their work area and their decision to retain/Preserve/ destroy Documents pertaining to their area of work.
iii. The modes of destruction of records can include methods like shredding, recycling, delete or destroy electronically stored data etc. or any other mode as permissible by law.

8. LIMITATIONS AND AMENDMENTS

The Board of Directors 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.

In the event of any conflict between the provisions of this Policy and of the Act or SEBI Regulations or Applicable Laws, the latter shall prevail and automatically apply to this Policy. The relevant provisions of the Policy will be amended or modified as needed to ensure consistency with the law.

Note:

The Board of Directors (the “Board”) at its Meeting held on 02nd September 2023 approved the Code of Conduct and is effective from 02nd September 2023.

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ANNEXURE – I

Documents whose Preservation shall be permanent in nature

Sr. No.	Concerned Department	Records
1	Secretarial	Certificate of Incorporation
2		Certificate of Change in Name
3		Certificate for commencement of business
4		Memorandum and Article of Association
5		Agreements made by the Company with stock exchange, Depositories, etc.
6		Licenses, Certificates authorization from Statutory authorities
7		Minutes of the meetings of the Board of Directors and of its committees
8		Minutes of all meetings of Shareholders
9		Statutory Registers
10		Register of Members
11		Register of Preservation and disposal of records
12		Applications and approvals for issuance and listing of Securities
13		Orders from Courts/ other regulatory authorities
14		Any other documents as may be required to be maintained permanently in terms of applicable laws, maintained and preserved from time to time.
15	Legal	Original Property Purchase and Sale Agreement
16		Property Card, Ownership records issued by Government Authority
17		Court Orders
18	Finance & Accounts	Tax Exemption and Related Documents
19		Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)
20	Human Resource & Admin	Warehouse License and Permissions

Any Document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective Functional Head of the Department in writing.

S J Logistics (India) Limited

ANNEXURE – II

Sr. No.	Concerned Department	Records	Preservation Period
1	Secretarial	Office copies of Notice of Board Meeting / committee meeting, Agenda, Notes on Agenda and other related papers	8 Years after end of Relevant Financial year
2		Board, committee Attendance Register	
3		Office copies of Notice of General Meeting and related papers	
4		General Meeting Attendance Register	
5		Statutory filings with the stock exchange, SEBI, Ministry of Corporate Affairs, Reserve Bank of India and any other statutory / regulatory authority	
6		Copy of newspaper advertisement or publications	
7		Annual Returns as per Companies Act, 2013	
8		MCA Forms	
9		Scrutinizers Reports and Voting Results	
10		Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013	
11		Instrument creating or modifying charge from the date of satisfaction of charge as per Companies Act, 2013	
12		Register of Allotment (from the date of each allotment) as per Companies Act, 2013	
13		Register of Deposits as per Companies Act, 2013	
14		All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto	
15		Any other Documents as may be required in terms of applicable laws, maintained and Preserved from time to time	

16	Legal	Documents relating to court orders including files, affidavits, correspondence etc	8 Years after closure of court case
17	Human Resource C Admin	Payroll Registers	8 Years
18		Bonus, Gratuity and other Statutory Records	8 Years
19		Unclaimed Wages Records	8 Years
20		Employees Medical Record	3 Years after separation
21		Time office Records and Leave Cards	3 Years after separation
22		Employees Information Records	3 Years after separation
23	Information & Technology	Documents in relation to procurement of IT hardware, software, licenses etc.	8 Years from the end of Financial Year
24		Operations & User Manuals	
25		License and Information Security Register Server logs	
26		Disaster Recovery Site logs	
27		Inventory of back up data	
28	Finance & Accounts	E-mails & Other related Documents	
29		Insurance Policies	5 years
30		Annual Plans and Budgets	8 years
31		Bank Statements	8 years
32		Investment Records	8 Years
33		Journal Entry support data	8 Years
34		Annual financial statements including: - Annual accounts; Director's report; Auditor's report	8 Years
35		Books of Accounts, Ledgers and Vouchers	8 Years

36		Excise Records	8 Years from the end of Financial Year
37		Tax Deducted at Source Records	8 Years from the end of Financial Year
38		Income Tax papers	8 Years from the end of Financial Year
39		Service Tax papers	8 Years from the end of Financial Year
40		Register of Income Tax Papers and Service Tax Papers	8 Years from the end of Financial Year

Where the Preservation period of Documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting Document Preservation identified in this Policy, as well as any other pertinent factors.

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