

## **Jana Holdings Limited**

### **Policy on Archival**

Doc#	JHL-AP-001
Date of creation	June 2023
Date of approval of the Board	June 7, 2023
Date of revision/review	17.05.2024
Content Owner	Jana Holdings Limited
Approver	Board of Directors
Confidentiality Level	Internal

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#### 1. Introduction

Jana Holdings Limited (JHL) is a wholly owned subsidiary of Jana Capital Limited. JHL received the Certificate of Registration under Section 45-IA(5) as a Type I NBFC ND Non-Operative Financial Holding Company ("NOFHC") from the Reserve Bank of India on 27th January 2017 as per the guidelines for licensing of new banks in the private sector issued by the Reserve Bank of India. JHL holds its investment in Jana Small Finance Bank (formerly known as 'Janalakshmi Financial Services Limited').

### 2. Background and Purpose:

Regulation 51(3) and Regulation 62 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations) requires all listed companies to host on its corporate website all such events or information which has been disclosed to stock exchange(s) under the Regulation and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website. Thus, this policy is made to ensure protection, maintenance and archival of its disclosures, documents and records that are placed on the website.

### 3. Scope:

The Policy seeks to enhance transparency, accountability and better relationship with stakeholders, by providing for framework for disclosure of required information/ events on the website of the Company.

### 4. Archival of Information

# A. For events or information disclosed under Regulations 51 (1) and 51 (2) of SEBI Regulations

All events or information disclosed under Regulation 51 (1), 51 (2) and any other Regulations to the Stock Exchanges on which the Company is listed and hosted on the Company's website shall be available on the Company's website for a period of five years or for such period as may be mandated under law from the date of uploading of the same on the website. However, if the disclosure requires a longer storage, the same will be considered appropriately. On a quarterly basis all announcements/ disclosures on the website of the Company would be moved to the archival folder after a period of 5 years from the date on which such disclosures/ announcements were made. The archived folder would be available for a period of two years.

### B. For disclosures made under other statutes/legislations

- All information required to be uploaded on the Company's website in pursuance of any other statute / legislation / regulation, shall be hosted on the Company's website, in the form, manner and for such period as may be mandated by that statute / legislation / regulation etc.
- In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one year from the date of uploading or more if deemed necessary.

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### C. Removing records from website

Any information/ form/ return/ document etc., disclosed on the Website as per A or B above, may be removed/ deleted from the website after such disclosure period.

### D. Archiving

Post the disclosure period, the records removed from the website shall be placed in electronic archives. Depending upon the criticality/ importance of records being removed, the Company may retain those records having long term value in the archives for permanent/ specified period storage and to suitably deal with the records accordingly.

### 5. Policy

Pursuant to the requirement under Regulation 51 (3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), for a period not less than 5 years thereafter will be achieved for 2 years and will be placed in the archived folder.

The Board of Directors of the Company shall make such alterations to this Policy as and when necessitated or as deemed fit, provided they are not inconsistent with the provisions of the applicable laws.

### 6. Amendments and Review

This Policy is subject to review by the Board of Directors at least once in a year.

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