

POLICY FOR PRESERVATION OF DOCUMENTS/ ARCHIVAL POLICY



SOLARWORLD ENERGY SOLUTIONS LIMITED

(formerly known as Solarworld Energy Solutions Private Limited)

1. LEGAL FRAMEWORK

This policy is created to comply with Regulation 9 of the Securities and Exchange Board of India (SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015. It outlines the preservation requirements for documents at Solarworld Energy Solutions Limited (“the Company”).

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company.

This policy has been adopted and approved by the Board of Directors at its meeting held on February 11, 2025.

2. DEFINITIONS

- i. **“Board”** shall mean the Board of Directors of the Company, as constituted from time to time.
- ii. **“Company”** shall mean “Solarworld Energy Solutions Limited”
- iii. **“Compliance Officer”**: Compliance Officer shall be an officer, who is a qualified Company Secretary and who is in whole time employment of the listed entity, not more than one level below the board of directors and shall be designated as a Key Managerial Personnel.
- iv. **“Documents”**: It refers to papers, notes, agreements, notices, advertisements, requisitions, orders, 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, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
- v. **“Electronic Form”**: It means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other 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 or access thereto.
- vi. **“Maintenance”**: It means keeping Documents, either physically or in Electronic Form.
- vii. **“Preservation”**: It means to keep in good order and to prevent from being altered, damaged or destroyed.
- viii. **“Listing Regulations”**: Refers to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

3. OBJECTIVE

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy contains guidelines on how to identify documents that need to be maintained, how long certain documents should

be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed. The purpose of this policy is to set standards for the management and preservation of documents, categorized into two main groups:

i. Permanent Documents

Documents listed in **Annexure 1** must be preserved indefinitely, including any updates or amendments.

ii. Time-bound Documents

Documents listed in **Annexure 2** must be kept for at least eight years after the completion of the relevant transaction, including any updates or amendments.

iii. Miscellaneous Documents

Any other documents which are required to be mandatorily maintained and preserved as per the applicable Statutory/ Regulatory provisions in this regard.

4. ROLES & RESPONSIBILITIES

Department Heads are responsible for the maintenance and preservation of documents within their areas of operation.

5. GENERAL COMPLIANCE

The Company will comply with any additional legal requirements that may arise over time.

The policy should be reviewed periodically by the management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

6. MODES OF PRESERVATION

- i. The documents may be preserved either in physical form or electronic form.
- ii. The preservation of documents should be in such a manner to ensure that there is no tampering, alteration, destruction, or anything which endangers the content, authenticity, utility or accessibility of the documents.
- iii. The preserved documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, to ensure integrity and confidentiality of the documents and prohibit unauthorised access.
- iv. The Company shall make appropriate provisions for back up of all documents preserved both physically and electronically.
- v. Documents in electronic format must be kept in the same manner as hard copy or paper documents. Due to the fact that the integrity of electronic documents, whether with respect to the

ease of alteration or deletion, or otherwise, may come into question, the administrator shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the Company.

7. DOCUMENT CREATION AND GENERATION

The Administrator shall discuss with staff the methods by which documents are created or generated. With respect to each employee or organisational function, the Administrator shall attempt to determine whether documents are created that can be easily separated from others, so that when the time comes to destroy (or retain) those documents, they can be easily culled from the others for disposition. For example, on an employee-by-employee basis, are e-mails and other documents of a significantly non-sensitive nature so that they might be deleted, even in the face of a litigation hold with respect to other, more sensitive, documents. This dialogue may aid in achieving a major goal of the Policy - resource conservation – by identifying document streams in such a way that the Policy can routinely provide for document destruction. Ideally, the Company will create and archive documents in such a way that documents with similar expirations can be easily identified and destroyed.

8. DESTRUCTION OF DOCUMENTS

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways with the prior written approval of any one of the Key Managerial Personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- i. Recycle non-confidential paper records; or
- ii. Shred confidential paper records; or
- iii. Delete or destroy electronically stored data.

This applies to both physical and electronic documents, including duplicates or unnecessary records.

9. ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the company for a period of 3 years on the advice of the concerned Department Head.

10. SUSPENSION OF DOCUMENTS DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

If the Company receives a Notice for documents from any of the Statutory Authorities, or if any Litigation is initiated by or against the Company, the disposal of documents that are the subject of the Notice/Litigation, etc. will be suspended until the matter is settled, resolved, or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents. If it is believed, or the Company has been informed, that Company records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), those records

must be kept until the Legal Department determines that they are no longer required. This exception supersedes any prior or subsequent destruction schedule for those records. If it is suspected that the exception may apply, or if there is any doubt about its applicability, the Legal Department should be contacted.

11. COMMUNICATION AND DISSEMINATION

All new employees will receive this policy as part of their onboarding. Existing employees and directors can access it on the company intranet and website.

12. AMENDMENTS

The Board may amend this policy as necessary, ensuring that changes comply with applicable laws.

ANNEXURE A - Documents / Record whose preservation shall be permanent in nature:

A. Under the Companies Act, 2013:

1. Certificate of Incorporation
2. Memorandum and Articles of Association
3. Register of Contracts
4. Register of Charges
5. Register of Directors and KMPs
6. Register of Loans and Investments
7. Register and Index of Members including Foreign Register of Members
8. Register of Renewed and Duplicate Share Certificates
9. Minutes of Board, Committee and General Meetings
10. Resolutions passed by Circulation
11. Various Forms and Returns filed
12. Audited Financial Statements

B. Under SEBI Regulations:

1. Listing Agreement
2. Trading approvals for securities
3. Offer documents for Public Issues and Private Placements

C. Under the Depositories Act:

1. Corporate actions regarding securities allotment
2. Allotment confirmations for ISINs
3. Agreements made by the Company with depositories

D. Others:

1. Register of Records and Documents destroyed

ANNEXURE B - Documents / Records to be preserved for a minimum period of eight years:

A. Under the Companies Act, 2013:

1. Register of Buy-back of Securities
2. Attendance Register
3. Notices, Agendas and Notes for Board and General Meetings
4. Instrument creating charge or modification (from the date of satisfaction of charge) by the Company
5. Register of Debentures and Debenture Trust Deeds including an index of the names, Foreign Register of Debenture Holder from the date of redemption of debentures or securities
6. Books of Accounts
7. Annual Returns and Annexures
8. Register of Transfer and Transmission of Shares
9. Scrutinizer's Reports and related papers regarding General Meetings (including AGM)
10. The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
11. Documents related to Managerial Personnel appointments
12. All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto
13. Return of declaration in respect of beneficial interest in any share
14. Dividend reconciliation statements

B. Under SEBI Regulations:

1. Reports filed with stock exchanges
2. Disclosure of various events and Press Releases
3. Intimations of Board Meetings
4. Copy of newspaper advertisement or publications
5. Audio recordings, video recordings of post earnings or quarterly calls, by whatever name called conducted physically or through digital means, as disclosed to the Stock Exchanges shall be available on the website for minimum period of two years and transcripts of such calls for five years. However, the audio/ video recordings and transcripts to be preserved by company for 8 years.

C. Others:

1. Compliance Reports received from any statutory authority
2. Income Tax Returns filed under Income Tax Act, 1961
3. 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 and/or the SEBI Regulations

This policy has been approved by the Board of Directors of the Company in their meeting held on February 11, 2025