

STERLING AND WILSON SOLAR LIMITED

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS & RECORDS

I. PREAMBLE:

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at least two categories, which are as follows:

- a. Documents preservation of which shall be permanent in nature; and
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Regulation 30(1) of the Listing Regulations requires every listed entity to make disclosures to the Stock Exchange(s) of any events or information which, in the opinion of the Board of Directors of the listed company, is material.

Further, Regulation 30(8) of the Listing Regulations requires listed entities to disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under Listing Regulations, 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.

This policy is formulated to determine the period for maintenance, preservation and disposal of physical and electronic Documents and Records of the Company.

II. DEFINITIONS:

- a. “**Archival**” means accumulation/storage of historical records on server/network or at a physical place.
- b. “**Board of Directors**” or “**the Board**” means the Board of Directors of Sterling and Wilson Solar Limited, as constituted from time to time.
- c. “**Company**” shall mean Sterling and Wilson Solar Limited.
- d. “**Documents**” or “**Records**” mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.
- e. “**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.

- f. “**Policy**” shall mean the Policy on Preservation & Archival of documents and records.
- g. “**Listing Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued there under, including any statutory modifications or re-enactments thereof for the time being in force.
- h. “**Material Events**” means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity’s website.
- i. “**Stock Exchanges**” means BSE Limited and National Stock Exchange of India Limited.

III. POLICY:

1. Preservation of Documents and Records

- a. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made there under, the Secretarial Standards and the Listing Regulations and other applicable law, rules, regulations (collectively, called “**Statutory Provisions**”) and internal policies of the Company, in force.
- b. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- c. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions (or such time period stipulated in the Listing Regulations and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant Head of Departments of the Company from time to time.

MODES OF PRESERVATION

- a. The Documents may be preserved either in physical form or electronic form.
- b. The relevant Head of Departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- c. 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.

- d. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorized access.
- e. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

2. Archival of Documents on website

The information on Material events shall be displayed on the website of the Company for a minimum period of 5 (five) years from the date of its publication (“**Mandatory Hosting Period**”) and thereafter, as per this Policy. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further Archival period of one year using appropriate technology.

IV. DISPOSAL OF DOCUMENTS AND RECORDS:

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:

- a. Recycle non-confidential paper records; or
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

V. REVIEW & AMENDMENT:

1. The Board shall review this policy and amend the same as and when required.
2. In case of any amendment(s), clarification(s), circular(s), etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

VI. DISSEMINATION OF THE POLICY:

The Policy, as amended from time to time, shall be placed on the website of the Company, www.sterlingandwilsonsolar.com.

VII. EFFECTIVE DATE:

This Policy shall be effective from the date of listing of the equity shares of the Company on the Stock Exchange(s).
