



WEBSOL ENERGY SYSTEM LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

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1. BACKGROUND

The Securities and Exchange Board of India (“SEBI”) vide its notification dated September 2, 2015 issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”) *inter alia* mandate listed entities to frame policy (s) for preservation and archiving of documents.

2. PURPOSE

The purpose of this document is to formulate a policy for preservation of documents in accordance with Regulation 9 of the SEBI Listing Regulations so as to provide a framework for their adequate protection and preservation as per applicable laws.

3. DEFINITIONS

“**Applicable laws**” means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

“**Board**” means Board of Directors of the Company as constituted from time to time.

“**Company**” means Websol Energy System Limited.

“**Document/s**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

“**Maintenance**” means keeping documents, either physically or in electronic form.

“**Policy**” means this Policy on Preservation of Documents formulated by the Company.

“**Preservation**” means to keep the documents preventing them from being altered, damaged or destroyed.

“**Register**” means a register maintained under the Companies Act, 2013 or the SEBI Act.

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

4. SCOPE

This policy shall govern the maintenance and preservation of documents as per Applicable Laws, including the SEBI Listing Regulations. The preservation of the documents shall be as per the periodicity stated in the guidance manual to the Policy

5. CLASSIFICATION OF DOCUMENTS

For the purpose of the Policy, the documents of the Company are classified as follows:

- (i) Documents which need to be preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.
- (ii) Documents with a preservation period of not less than the time period stipulated in the SEBI Listing Regulations and other laws and statutes applicable to the Company from time to time after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period. This is currently eight (8) years.

6. MODES OF PRESERVATION

- The Documents may be preserved either in physical form or electronic form.
- The officer(s) 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). This is more particularly as set out in the guidance manual.
- 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.
- 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 unauthorised access.
- The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

7. DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under **Annexure A**.

8. REVIEW

This Policy may be reviewed and amended from time to time by the Board, in line with the changing regulatory requirements, or in case the Company faces any practical difficulties in implementing the Policy.

9. COMPLIANCE

All employees of the Company are required to comply with the provisions of this Policy and the guidance manual.

10. INTERPRETATION

In any circumstance where the terms of this Policy is inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy and procedures.

Approved in the Meeting of Board of Directors dated 18th March, 2024

ANNEXURE – A

Indicative List

A. PERMANENT PRESERVATION:

- a) Certificate of Incorporation/Certificate of Change of name
- b) Memorandum and Articles of Association
- c) Certificate of Commencement of Business
- d) Minutes Books of Board, General Meetings and Committee Meetings
- e) Statutory Registers
- f) Common Seal
- g) Licence, other permits or Statutory Approvals (permanent/till the date of validity)

B. TEMPORARY PRESERVATION UPTO 8 YEARS:

- a) Annual Returns,
- b) Board Agenda and supporting documents,
- c) Attendance Register
- d) Register of Deposits
- e) Register of payment of Dividend
- f) Register of Proxies
- g) Office copies of Notice of General Meeting and related papers,
- h) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- i) All notices pertaining to disclosure of interest of directors,
- j) Instrument creating a charge or modification,
- k) Books of accounts, financial statements etc. and

C. OTHERS:

As per applicable law.