STERLITE ELECTRIC LIMITED[1]

- **POLICY FOR PRESERVATION OF DOCUMENTS**
- **ARCHIVAL POLICY**

Owner:
Corporate Secretarial Department

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Version:
Policy - 2.0

Note: The Policies listed above, to the extent they are applicable to an un-listed public company, shall become applicable from the date of its approval by the Committee/Board, as the case may be. Post listing of the equity shares of the Company with the Stock Exchange(s), the policies would become fully applicable to the Company.

[1] The name of the Company was changed from Sterlite Power Transmission Limited to Sterlite Electric Limited with effect from April 15, 2025, vide special resolution passed by the Members/Shareholders on January 25, 2025.

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1. INTRODUCTION

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and the Companies Act, 2013. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of the Companies Act, 2013.

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

i. documents whose preservation shall be permanent in nature ;
ii. documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (i) and (ii) in electronic mode.

Besides the above, as per applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of the Companies Act, 2013.

3. PRESERVATION OF DOCUMENTS

A. Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1) the documents whose preservation shall be permanent in nature

- **Annexure 1** of this policy contain the details of documents whose **preservation shall be permanent** in nature.

2) documents with preservation period of not less than eight years after completion of the relevant transactions.

- **Annexure 2** of this policy contains the details of documents with **preservation period of not less than eight years** after completion of the relevant transactions.

3) documents with preservation period other than those mentioned in (2) above

- **Annexure 3** attached herewith contain the details of documents with preservation period **other** than those mentioned in (2) above.

B. Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

4) The Company is to maintain a functional website containing

- the basic information about the Company;
- All Information and/or documents as specified in the applicable provisions of the Companies Act, 2013;
- All Information and/or documents as specified in Regulation 62 (1) and other relevant provisions of the Listing Regulations;
- All Information and/or documents provided to/ filed with stock exchanges.

5) The Company shall ensure that contents of the website are correct.

6) Information and/or Documents, required to be made available on the website under Regulation 62(1) and other relevant provisions of the Listing Regulations, shall be made available on the website within seven working days from the date of dissemination of information and/or documents by the Company, unless specified otherwise. The Company shall update any change in the content of its website within seven working days from the date of such change in content.

7) Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.

4. MODE OF MAINTENANCE & STORAGE FACILITY

Documents mentioned in sub clause (A) & (B) of Clause 3 above shall be maintained/ preserved in the following manner**:**

A. Documents maintained in physical form:

1. All information and/ or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

B. Documents maintained in electronic form:

1. All documents pertaining to current financial year and for one preceding financial year shall be maintained on server and timely Backup be maintained periodically. The documents shall be maintained in such a manner that their retrieval is easy and quick.

2. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

5. ARCHIVAL POLICY

As prescribed under R. 30(5) of the Listing Regulations, the Company shall disclose on its website all such events or information which are disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the discretion of the Company Secretary, who may decide to retain the information hosted or discard the same.

6. OBSOLESCENCE & ARCHIVAL OF DOCUMENT

Any document or record which is no longer required shall be trashed or disposed off in a manner to prevent any misuse. This shall be done after proper authorization from the concerned Functional Head and the same shall be in accordance with the approved Policy, Guidelines and Standard Operating Procedure issued from time to time in this regard.

The details of documents destroyed by the Company shall be recorded in the register of disposal of records to be kept by authorized persons who are disposing of the documents. This applies to both physical and electronic Documents.

Archived documents and records must be maintained in safe and secure place to ensure timely and proper retrieval as and when necessary.

7. LOSS OR DAMAGE TO DOCUMENTS

Loss, damage or theft of any Company document or record must be immediately reported to the concerned Line Manager and also the Functional Head for further action as may be necessary in the matter.

8. EMPLOYEE SEPARATION

Upon superannuation or separation for any other reason (transfer, resignation, termination etc.) from the Company, each employee must forthwith return to the authorized official all the

Company records and documents (with a complete list of documents, files, papers etc.), in proper condition, which are in his custody or control.

9. COMPLIANCE WITH REGULATORY PROVISIONS ETC.

The compliance of applicable rules and regulatory provisions shall always be ensured. In the event of a conflict between the provisions of this Policy and those prescribed under applicable rules and regulations, the latter shall prevail.

10. EXCLUSIONS

Any document or record created in the routine course of working and which is not required to be maintained in terms of applicable rules and regulations will not be governed by this Policy. Further, the Policy does not apply to personal or non-business information.

11. AMENDMENTS

This Policy shall be reviewed as and when considered necessary as per business exigencies of the Company.

12. BREACH OF POLICY

Failure to retain documents or records in appropriate form and manner could expose the Company and its officers to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation. Any person guilty of breaching any of the provisions of the Policy will be subject to such disciplinary action, as may be decided by the Company which may lead to wage freeze, suspension or termination from services of the Company. The disciplinary action taken by the Company will be in addition to any other penalty or re-course as may be prescribed under applicable statute(s) governing such matter or breach.

ANNEXURE - 1

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

Sl. No.	Document	Place of Preservation	Person responsible for custody	Reference of provision	Period
1	Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013	Registered office		Sec 7(4) of the Companies Act, 2013	Permanent, till dissolution of the Company
2	Register of Renewed and Duplicate Share Certificates	Registered office of the Company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose	Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014	Permanent
3.	Share certificate forms and related books and documents – **Disputed Cases**	Registered office of the company or at such other place where the said documents are kept	Company Secretary or any other person authorized by the Board for the purpose	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Permanent
4.	Register of Charges	Registered office	Company Secretary	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent
5.	Register of Members along with the index	Registered office of the company or at such other place where the said documents are kept	Company Secretary or any other person authorized by the Board for such purpose	Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Permanent

6.	Foreign Register of Members, if any	Registered office of the company or at such other place where the said documents are kept	Company Secretary or person authorised by the Board	Rule 15 (4) of the Companies (Management and Administration) Rules, 2014	Preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register
7.	Minutes of proceedings of general meeting and meeting of Board of Directors, creditors, committees of the Board and resolutions passed by Circulation.	Registered Office or at such other place as may be approved by the Board.	Company Secretary	Rule 25(1)(d) & (e) of the Companies (Management and Administration) Rules, 2014 and Secretarial Standards 1& 2 – clause 8.1& 18.1	Permanent
8.	Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
9.	Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)	Registered Office	Company Secretary	Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent

10.	Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose	Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
11.	Minutes of all the general, Board & Committee Meetings of the transferor Company as handed over to the transferee company.	Registered Office or at such other place as may be approved by the Board.	Company Secretary	8.1& 18.1 (Secretarial Standards-1 & 2)	Permanent

* Note: The Company may maintain Registers/records though Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.

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ANNEXURE – 2

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

A. Mandated under the Companies Act, 2013

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1.	Register of Deposits accepted or renewed	Registered Office		Rule 14(3) of The Companies (Acceptance of Deposits) Rules, 2014	Not less than 8 years from the financial year in which the latest entry is made in the register
2.	Instrument creating charge or modification thereon	Registered Office		Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
3.	Register of debenture holders or any other security holders along with the index	Registered Office or at such other place as may be approved by the Board.	Company Secretary or any other person authorized by the Board for such purpose	Rule 15 (2) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of debentures or securities,
4.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Registered Office or at such other place as may be approved by the Board.		Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.
5.	Foreign register of debenture holders or any other security holders	Registered Office or at such other place as may be approved by the Board.	Company Secretary or person authorised by the Board	Rule 15 (4) &(5) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of such debentures or securities.

6.	All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the financial year to which it relates
7.	The attendance register of Board & Committee Meetings	Registered Office or at such other place as may be approved by the Board.	Company Secretary	4.1.7 of Secretarial standards -1	8 financial years
8.	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office or at such other place as may be approved by the Board.		8.2 of Secretarial Standards-1	As long as they remain current or for 8 financial years whichever is later
9.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office or at such other place as may be approved by the Board.		18.2 (Secretarial Standards-2)	As long as they remain current or for 8 financial years whichever is later
10	Books of Accounts	Registered Office or at such other place as may be approved by the Board.			8 financial years

B. Other Documents Voluntarily preserved

Sl. No.	Document	Provision of law	Period of preservation
1	Attendance slips for Annual/ Extraordinary General Meeting	--	8 financial years
2	Dividend Payment Records	--	8 financial years

* Note: The Company may maintain Registers/records though Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.

ANNEXURE 3

DOCUMENTS WITH PRESERVATION PERIOD AS MENTIONED IN LAST COLUMN OF EACH ENTRY

Sl. No.	Document	Person responsible for custody	Reference of provision	Period
1.	Share certificate related books and documents (other than disputed cases)	Company Secretary	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	30 years
2.	Share certificates surrendered to company immediately be defaced by stamping or printing the word "cancelled" in bold letter)	Company Secretary	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	3 years from the date on which they were surrendered

* Note: The Company may maintain Registers/records though Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.