



POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

OBJECTIVE & SCOPE:

This Policy is intended to provide guidelines for the retention of records and preservation of relevant documents in the Company's website www.sunedisoninfra.com and the duration after which the documents shall be archived. This policy is implemented as per Regulation 9 read with Regulation 30 (8) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), for the preservation of the documents inter alia to aid the employees in handling the documents efficiently either in physical form or electronic form. It not only covers the various aspects on the preservation of the documents but also archival and safedisposal/destruction of the documents.

DISCLOSURES TO STOCK EXCHANGES TO BE PRESERVED / RETAINED ON WEBSITE

The events or information which has been disclosed by the Company to the Stock Exchanges under Regulation 30 will be hosted on the Website of the Company www.sunedisoninfra.com for a period of not less than five years. After completion of five years, the documents shall be archived on the website for a period of three years under the "Archives" tab on the Company's website. www.sunedisoninfra.com

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

Based on the recommendation of the management of the Company, the Board of Directors have classified the following documents to be retained and preserved for posterity by the company either in physical or electronic form as outlined below.

1. Documents that need to be preserved/retained permanently such as:

Record Type	Responsibility
Annual Audit Reports and Financial Statements (including schedules)	Accounts/Finance Department



Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of the board, committees, Shareholders meetings thereof, annual reports originals, Etc.)	CS Department

Statutory approvals	CS Department
Policies and Procedures	
Investment Records	
High Court/ Supreme Court Orders if any, Trademark & Copyright.	Legal Department
HR E-manual	Human Resource Department
VAT, CST & Service Tax – Registration	Commercial Department
Certificates of all states	
Import Export Code	

2. Documents that may be preserved/retained for a period of 8 years:

Record Type	Responsibility
Accounting and Finance records including Annual Financial statements excluding the following: a. General Ledger b. Land documents - sale / purchase deeds c. Books of Accounts (For 8 Years)	Finance Department
Tax Records excluding the following: a. Tax-Exemption Documents and related correspondence b. Annual Information Returns –	



State and Central	
Compliance related records excluding the following: a. FEMA/ RBI related documents and filings b. Register of Members	Secretarial Department
Legal Records: a. Litigation, Arbitration files & Records b. Contracts entered into by the Company with its customers.	Legal Department

Additionally certain types of records will be retained for a certain period of time, as identified below:

Record Type	Responsibility
Accounting and Finance records: Central excise documents (including duplicate for transporter copy of bills) (5 Years after assessment) a. General Agreements (including loan documents) (8 Years after expiry)	Finance Department



Personal and HR Records: Personal files of individual current Employees – Register of Employment (attendance & leave details) - 2 years Register of Wages - 2 years Register for Maternity Benefit Act – 2 Years Register of National & Festival Holidays – 2 Years Employees State Insurance Act – 5 years b. Annual Information Returns – State and Central	Human Resource Department
Legal Records: a. Litigation, Arbitration files & Records b. Contracts entered into by the Company with its customers.	Legal Department

In the event of a major incident, the first priority is the safety of the people, followed by immediate rescue action to prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

REVIEW & AMENDMENT

This Policy comes into effect from April, 01, 2019. In addition to the above, the Board of Directors at any time may decide additional records to be preserved for a longer period of time by suitably amending the policy.

The Board of Directors are authorized to amend this Policy as may be required from time to time, subject to applicable laws.
