

ARCHIVAL POLICY

PRESERVATION OF DOCUMENTS & RECORDS

PREAMBLE

According to Regulation 30(8) and Regulation 46 of the SEBI Listing Regulations, all listed companies must post various disclosures required by the SEBI Listing Regulations on their website. These disclosures must be made for a minimum of Nine (8) years, after which they must be removed in accordance with the listed entity's archival policy, which is outlined on the website.

This Archival Policy (the "Policy") was created to establish guidelines for the archiving of records and documents. This policy was agreed by the company's board of directors at its meeting on 16th June 2025. This policy will go into effect on the day the company's equity shares are listed.

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

DEFINITIONS

- I. **"Archival"** means accumulation/storage of historical records on server/network or at a physical place.
- II. **"Board of Directors"** or **"the Board"** means the Board of Directors of InSolare Energy Limited, as constituted from time to time.
- III. **"Company"** shall mean Sterling and Wilson Solar Limited.
- IV. **"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.
- V. **"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.
- VI. **"Policy"** shall mean the Policy on Preservation & Archival of documents and records.

- VII. **"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.
- VIII. **"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.
- IX. **"Stock Exchanges"** means BSE Limited and National Stock Exchange of India

POLICY PURPOSE

1. Preservation of Documents and Records

- a)** The Company shall retain all its records in accordance with the provisions of the Companies Act, 2013, the Rules thereunder, Secretarial Standards, Listing Regulations, and any other applicable laws, rules, and regulations (collectively referred to as "**Statutory Provisions**"), as well as the internal policies of the Company in effect.
- b)** Documents and records that are required to be retained under applicable laws and regulations shall be preserved either permanently or for the duration specified by relevant laws, as may be updated from time to time.
- c)** Documents and records that need to be retained for a minimum of 8 years after the completion of the associated transactions (or for such time as mandated by the Listing Regulations or any other laws and statutes applicable to the Company) shall be preserved for the prescribed duration, as determined by the respective 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 anticipated to observe the compliance of requirements of applicable law shall be the person(s) responsible for preserving the Documents (authorized person).
- c) Structured databases where records are stored in tables and can be easily queried, retrieved, and reported. This is often used for storing transactional or structured data also the Systems that are specifically designed to store and manage the lifecycle of documents in digital format, with features such as version control, metadata tagging, and audit trails.
- d) Documents pertaining to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter, where there is no such requirement as per Applicable Laws, then such documents shall be preserved for such period till the subject matter is closed/completed/settled or otherwise.
- e) Documents like License, Registration, and Permission etc shall be preserved permanently, unless the relevant activities/matter is closed and no longer required in future.
- f) 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 unauthorized access
- g) Documents like Deed/Agreements /Ownership right etc in relation to Immovable properties shall be permanently preserved unless such Immovable Properties is no longer properties of the Company.
- h) The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

DESTRUCTION AND DISPOSAL OF DOCUMENTS

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

- a. Recycle non-confidential paper records.
- b. Shred or otherwise render unreadable confidential documents.

REVIEW AND AMANDEMENTS

The Board of Directors shall periodically review this Policy and make any amendments or updates as deemed necessary.

If any amendment, clarification, circular, or directive is issued by the relevant authorities that conflicts with the provisions outlined in this Policy, the provisions of such external document(s) shall take precedence. In such cases, the relevant provisions of this Policy will be automatically revised to align with the updated requirements, and the Policy will be deemed amended accordingly, effective from the date specified in the respective amendment, clarification, circular, or directive. This ensures that the Policy remains in compliance with any legal, regulatory, or statutory changes.

POLICY DISSEMINATION

The policy shall be continuously hosted on the website of the Company after the approval of the Board of Directors and after every amendment/ updating thereof.

EFFECTIVE DATE

It should be the date of approval by the board of directors.