

# SOLEX ENERGY LIMITED

## Policy for Preservation of Document & Web Archival Policy

*(Reviewed & Revised by the Board of Directors in its Meeting  
dated August 7, 2025)*

## 1. Introduction

This policy document outlines the framework adopted by Solex Energy Limited (“the Company”) for the preservation and archival of its documents, both in physical and electronic form. The policy is formulated in accordance with the applicable provisions of the Companies Act, 2013 and Regulations 9 and 51(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “LODR”). The purpose of this policy is to establish uniform guidelines for systematic identification, categorization, maintenance, retention, review, and destruction of records created or received during the Company’s operations. It also defines the mechanism for archiving disclosures made to stock exchanges and their availability on the Company’s website.

## 2. Purpose of the Policy

This policy serves a dual objective. Firstly, it ensures that the Company remains compliant with statutory and regulatory obligations under LODR by implementing a structured approach to document preservation and archival. Regulation 9 of LODR mandates every listed entity to formulate a policy for the preservation of documents, while Regulation 51(3) requires disclosures made to stock exchanges to be hosted on the Company’s website for a minimum period of five years, post which such information must be archived in accordance with the Company’s archival policy. Secondly, it provides clarity to employees and stakeholders on the retention period of various classes of documents and ensures efficient and judicious management of business records.

## 3. Definitions

In the context of this policy, the term “Policy” refers to the Policy on Preservation and Archival of Documents as adopted and hosted on the Company’s official website.

## 4. Classification and Preservation of Documents

All corporate, financial, operational, legal, and administrative records of the Company shall be classified into categories based on the nature of the document and the duration for which it is required to be preserved. Certain records shall be retained on a permanent basis due to their enduring relevance to the Company’s legal standing, financial integrity, and operational history—these include statutory registers, certificates of incorporation, annual financial statements, board and shareholder meeting minutes, and legal title documents. Documents pertaining to tax filings, property ownership, and regulatory filings are also classified under this permanent preservation category.

For other records, particularly those related to transactional or operational matters, a minimum retention period of eight years after the completion of the relevant transaction shall be followed. This includes, but is not limited to, bank statements, stock exchange filings, CSR project records, legal documents, correspondence, contracts, and tender documents. These are preserved to ensure statutory compliance, address potential future litigation or audits, and serve as reference for ongoing operations.

In certain cases, a retention period of at least three years is considered sufficient. This category covers procedural records such as proof of circulation of board and committee meeting agendas, minutes, resolutions, and general meeting notices. While not required to be held permanently, these records play a vital role in demonstrating procedural compliance and internal governance during their retention lifecycle.

In all cases, where records are no longer needed beyond the prescribed period, they shall be evaluated for disposal in a secure and efficient manner to avoid unnecessary storage costs and to uphold data security standards as per Annexure attached.

## **5. Responsibility of Employees**

All employees of the Company are entrusted with the responsibility of preserving documents relevant to their respective functions in accordance with this policy. Each employee is expected to exercise diligence and sound judgment in identifying records for retention or disposal. Department Heads are especially accountable for the appropriate execution of the policy within their departments and must ensure adherence to prescribed retention timelines. They are also responsible for initiating disposal of outdated documents, subject to internal approvals and documentation as described herein.

## **6. Disposal of Documents**

The disposal process shall apply primarily to records falling under the categories requiring retention for eight or three years. Once the defined retention period has lapsed, and provided no litigation, inquiry, audit, or investigation is pending or expected in relation to those records, the documents may be securely disposed of. Disposal should be conducted in an environmentally conscious and legally compliant manner, with approval from the respective Department Head.

To ensure traceability and transparency in the disposal process, a dedicated Register of Records Disposal shall be maintained permanently. This register shall record brief particulars of each document disposed, the legal provision governing it, date and method of disposal, and the initials of the authorized person approving such disposal. This register may be maintained either in physical or electronic format.

## **7. Suspension of Disposal in Legal Cases**

In the event of a pending or anticipated litigation, audit, or investigation, the Company shall immediately suspend any routine destruction of documents, regardless of their prescribed retention period, if those documents are related to or may be required in the matter. This suspension shall continue until it is confirmed that the matter is closed and no further legal or regulatory inquiry is expected. All employees shall be responsible for alerting their Department Heads upon becoming aware of such scenarios, thereby triggering the suspension protocol.

## 8. Compliance with Statutory Requirements

Where any applicable legislation, rule, regulation, or judicial order requires a longer retention period for any type of document than what is prescribed in this policy, such legal stipulations shall override the provisions of this policy. Examples include statutory recordkeeping obligations under the Income Tax Act, Information Technology Act, or sector-specific regulatory guidelines. The Company shall ensure that such records are preserved accordingly and in the prescribed format (electronic or physical).

## 9. Web Archival Policy

Pursuant to Regulation 51(3) of LODR, the Company shall ensure that all disclosures and material information submitted to the stock exchanges are simultaneously posted on the Company's official website. Such disclosures shall be maintained on the website for a minimum period of five years from the date of publication. After the expiry of this five-year period, the disclosed material shall be archived in a manner that allows retrieval when required, and shall continue to be preserved for an additional period of three years. Archiving may be carried out by transferring the content to a digital archive directory or a secure storage system in accordance with internal IT protocols.

## 10. Policy Review

This policy shall be periodically reviewed by the Board of Directors or the Executive Director of the Company to assess its relevance, effectiveness, and compliance with the latest regulatory developments. Modifications to the policy, as deemed necessary during the review process, may be incorporated to ensure alignment with evolving legal and operational requirements.

## 11. Amendments

Any subsequent changes in the applicable laws, regulations, or notifications from statutory authorities relating to the subject matter of this policy shall be deemed to be incorporated herein by reference. The Company shall update the policy document accordingly to reflect such changes and ensure continued compliance.

## ANNEXURE

### A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committees and Shareholders' Meetings, Register of Members and other Statutory Records;
6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc.);
7. Any other record as may be decided by any KMP (as per Companies Act 2013) or the Board of Directors of the Company from time to time;
8. Filings with Registrar of Companies.
9. A copy of Register of Debenture holder provided by RTA.

### B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

1. Bank Statements and vouchers;
2. Filings with Stock Exchanges and other statutory authorities;
3. Corporate Social Responsibility Records;
4. Sponsorship Projects Records;
5. Correspondence and Internal Memoranda;
6. Any other record as may be decided by the Board of Directors/Executive Director of the Company from time to time;
7. Security Deposit Receipts (after receipt of deposit money back);
8. Tender Documents;
9. Lease Deeds and Contracts;
10. Legal files;
11. Insurance Records including policies and claims;
12. All e-mail correspondence, internal & external;

**C. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN THREE YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:**

1. Proof of sending Notice of Board Meetings and Committee meetings and its delivery.
2. Proof of sending Agenda and Notes on Agenda and their delivery.
3. Proof of sending and delivery of the draft of the Resolution(s) and the necessary papers.
4. Proof of sending draft Minutes of Board and Committee meetings and its delivery.
5. Proof of sending signed Minutes of Board and Committee meetings and its delivery.
6. Record of each recipient to whom the Notice of General Meeting(s) has been sent and copy of such record and any Notices of any failed transmissions and subsequent re-sending.