SUNKIND INDIA LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

SUNKIND INDIA LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. INTRODUCTION

1.1 Documents and Records in whatever form is an essential and significant part of the Company's resources. Documents and Records are a basic tool of administration. They are the means by which operational processes and functions are performed.

1.2 In terms of the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["**SEBI Listing Regulations**"], read with Regulation 30(8) of the SEBI Listing Regulations, all the listed companies are required to formulate a policy on preservation of documents. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013 ["**Act**"].

2. OBJECTIVES

2.1 The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately preserved, protected and if required, destroyed as per the statutory requirements after following the due process. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

2.2 All Corporate Information and records of the Company are crucial for the business continuity and have to be preserved and retained as per the governing Policy of the Company. Further, the Policy aims to disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance of the Company at regular intervals.

3. MANNER AND PLACE OF PRESERVATION / MAINTENANCE

3.1 The records shall be preserved / maintained or archived at the Registered Office of the Company, unless the applicable statutes permits it to be maintained at any other place, as long as the location of each records can be determined easily and retrievable within a reasonable amount of time.

3.2 Records should be stored and disposed of securely and in such a way that confidentiality and privacy of non-public documents are maintained.

Sunkind India Limited
Gurugram

4. CLASSIFICATION OF DOCUMENTS:

4.1 This policy sets the standards for managing, storing and preservation of documents of the Company, broadly classified in the following two categories as per **Annexure-1**, which may be preserved, in physical and / or electronic mode:

i) to be preserved permanently, and

(ii) to be preserved for a specific period of not less than eight years after completion of the relevant transactions.

4.2 All other documents and records not mentioned above shall be preserved in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars and notifications etc. and where no time period is prescribed, shall be preserved for a minimum period of 8 (eight) years. The Company shall at all times maintain a functional website. The website shall contain information about the Company, its business and the services provided by it, all press releases, key contact details etc. and shall also contain such information, documents, disclosures etc. as are prescribed under various statutes to be uploaded on it. All the contents of the website shall be correct. The Company shall update any change in the content of its website within two working days from the date of such change in content.

5. ARCHIVAL PROCESS FOR THE DOCUMENTS:

5.1 The event / information disclosed to the stock exchanges shall also be placed on the website of the Company for a minimum period of five years or for such other period, as may be prescribed from time to-time under the SEBI Listing Regulations or any other applicable laws.

5.2 After completion of the minimum period of five years or such other period as prescribed by the SEBI Listing Regulations or other applicable laws, the events or information shall be archived by the Company. Thereafter, such events or information may cease to be displayed on the website of the Company.

5.3 However, for any disclosure of event which is the subject matter of any ongoing litigation and/or required to be preserved in terms of applicable provisions of Law/Statute, such disclosure shall continue to remain on the website of the Company irrespective of its duration thereat.

6. DESTRUCTION / DISPOSAL OF DOCUMENTS:

6.1 The destruction and disposal of Documents shall be done in compliance with the provisions prescribed under the applicable laws and keeping in view this Policy of the Company. All the Documents containing information of a confidential or sensitive nature on paper, card, or electronic media must be securely destroyed when it is no longer required

6.2 The employees of the respective departments shall be entitled to destroy/dispose of the documents mentioned in the policy only with prior approval of the respective functional heads who are authorized to preserve such documents.

Sunland India Limited
Gurugram

7. MONITORING AND EVALUATION OF THE POLICY:

7.1 The Board can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Sunkind India Limited Gurugram

--------------------------------x----------------------------------

Annexure-1

Illustrative list of Documents whose preservation shall be permanent in nature

Serial No.	Document Type
I.	**Incorporation Documents** • Copies of all documents and information as originally filed under section 7(1) (incorporation) under the Companies Act, 2013 • Certificate of Incorporation • Certificate of Commencement of Business • Memorandum of Association • Articles of Association • Statutory Licenses, Registrations and Permits • Permanent Account Number Card
II.	**Shares & Secretarial** • Annual Report • Listing Agreement with the Stock Exchange(s) • Tripartite Agreement with the Depositories and the Registrar and Share Transfer Agent (RTA) of the Company • Agreement with the RTA • Prospectus • Offer Document for Rights Issue • Documents related to Bonus Issue, Rights Issue, Stock split, etc. • Documents related to declaration of Interim and Final Dividend
III.	Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, creditors, committees of the Board and resolutions passed by Circulation.
IV.	Statutory Registers and index thereof required under applicable laws to be kept permanently
V.	Order passed by any Courts or Tribunal or Statutory bodies or any authority or judgement/ which are final in nature
VI.	Copyrights, Trademarks, industrial designs and Patents etc. owned by Company
VII.	Register of Renewed / Duplicate Share Certificates and all books / documents relating to the issue of share certificates, including the blank forms of share certificates
VIII.	Company Policies / Code of Conduct
IX.	Audited Financial Statements with Audit Report and other related documents
X.	Any other documents which are required to be preserved permanently in accordance of applicable law(s), Act, rules or regulations, guidelines, circulars and notifications etc. as may be applicable to the Company from time to time.

Sunkind India Limited * Gurugram

Illustrative list of Documents with preservation period of not less than eight years after completion of the relevant transactions

Serial No.	Document Type
I.	**Finance & Accounting** • Books of Accounts & Vouchers • Audit Related Documents • Unaudited Financial Statement with other related documents • Taxation documents include, but not limited to documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeals preferred against any claim
II.	Attendance registers, notices, agenda and notes to agenda of general meetings, board meetings and committee meetings and scrutinizer's report of general meetings
III.	Annual Return and related documents
IV.	Instrument creating a charge including modification and satisfaction thereof
V.	Documents relating to Postal Ballots
VI.	All Press Releases and publicly filed documents
VII.	Forms (including e-forms), returns and documents including agreements, receipts, undertakings, affidavits with the Registrar of Companies, Regional Director, Ministry of Corporate Affairs, Government of India, Central government and/or any other Statutory Authority(ies)
VIII.	Employment/ Personnel Documents
IX.	Register including Foreign Register of debenture holders or any other security holders along with the index
X.	Any and all kinds of filing to Stock Exchanges
XI.	Any other document which are required to be preserved for not less than 8 years in accordance with the provisions of applicable law(s), Act, rules or regulations, guidelines, circulars and notifications etc. as may be applicable to the Company from time to time.

Note: In addition to the illustrative list of documents mentioned above, there may be other business agreements, including but not limited to Power Purchase Agreements (PPAs), EPC Contracts, and Operation & Maintenance Agreements, which shall be preserved as required.

Sunkind India Limited
Gurugram