

SUZLON ENERGY LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. Policy history

Date of Board approval	Particulars	Effective Date
3 rd December 2015	Approval of policy in terms of Regulation 9 of the Listing Regulations	3 rd December 2015
2 nd November 2023	Review and amendment of the policy in terms of Listing Regulations	2 nd November 2023

2. Purpose of this Policy

- 2.1 Suzlon Energy Limited (“SEL or the “Company”) has adopted this Policy in terms of the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- 2.2 The purpose of this Policy is to lay down procedure for preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “Documents”) with a view to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

3. Applicability of this Policy

- 3.1 This Policy applies to Suzlon Energy Limited (the “Company”).
- 3.2 This Policy may be adopted by the Company’s subsidiaries subject to suitable modifications, if and to the extent required.

4. Definitions

Unless repugnant to the context:

- 4.1 “Act” shall mean the Companies Act, 2013 including the Rules made thereunder, as amended from time to time.
- 4.2 “Applicable Laws” shall mean the Act and Rules made thereunder, the Listing Regulations (as defined hereafter) and / or such other Act, Rules or Regulations which are / may be applicable for the preservation of documents.
- 4.3 “Board” or “Board of Directors” shall mean the Board of Directors of the Company.
- 4.4 “Company” or “SEL” shall mean Suzlon Energy Limited.
- 4.5 “Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force.

- 4.6 “Policy” or “this Policy” shall mean the Policy for Preservation of Documents.
- 4.7 Interpretation – In this Policy unless the contrary intention appears, words and expressions used and not defined in this Policy but defined in the Applicable Laws shall have the meanings respectively assigned to them in those Applicable Laws.

5. Review of the Policy and disclosure requirements

- 5.1 This Policy has been implemented w.e.f. 3rd December 2015 and has been subsequently modified on 2nd November 2023.
- 5.2 This Policy may be disclosed on the website of the Company and a weblink may be provided in the Annual Report.
- 5.3 The Board will review this Policy on a periodic basis to ensure its effectiveness and also compliance with the Act and the Listing Regulations.
- 5.4 This Policy is subordinate to the Listing Regulations or other applicable statutory provisions including the Act and in the event of inconsistency between this Policy and the Applicable Laws (including due to subsequent amendments to the Applicable Laws), the provisions of the Applicable Laws will prevail.
- 5.5 To the extent any change or amendment is required due to change in the Applicable Laws, the Managing Director or the Chief Executive Officer of the Company shall be authorised to review and amend the Policy to give effect to any such changes or amendments. Such amended Policy shall be placed before the Board for noting and necessary ratification.
- 5.6 The Board reserves the right to alter, modify, add, delete or amend any of the provisions of this Policy.

6. Administration

- 6.1 Attached as Appendix A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in physical mode or electronic mode.
- 6.2 The Chief Financial Officer, Presidents, Head of the Departments who are responsible for relevant areas of the Company’s operations (“Responsible Officers”) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed.
- 6.3 The Documents Preservation Schedule may be modified / supplemented from time to time to ensure that it is in compliance with local, State and Central Laws.

7. Adherence of the Policy by the employees:

- 7.1 The Company expects from its Responsible Officers to understand and fully comply with this Policy and schedules, provided however that if it is believed, or the Company informs otherwise, that Company records are relevant to litigation, or potential litigation (i.e. a dispute that could result in litigation), then the same be preserved until the Responsible Officers / Legal Department determines the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those

records. If any employee believes that exception may apply or have any question regarding the possible applicability of that exception, he or she should contact the Responsible Officers / Legal Department.

- 7.2 Further, in the event that the Company is served with any legal or statutory notice for any Document(s) from any of the statutory authorities or any litigation / proceeding is commenced by or against the Company, than the disposal of documents which are subject matter of such notice or litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. In such cases, the Responsible Officers / Legal Department shall immediately inform relevant employees of the Company for suspension of further disposal of Documents.

8. Procedure for disposal of Documents

- 8.1 The Documents that are no longer required as per the Documents Preservation Schedule prescribed in the Appendix A may be destroyed.
- 8.2 The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A.
- 8.3 The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing the Documents in the format prescribed at Appendix B.

APPENDIX A

Documents Preservation Schedule

Sr. No.	Document Type	Preservation Period
1.	Common Seal, Certificate of incorporation, Certificate of change of name (if any), copies of all documents and information as originally filed under section 33 (incorporation) of the Companies Act, 1956, Memorandum and Articles of Association as amended from time to time, Counter folios of Share Certificates issued from time to time	Permanent
2.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3.	Statutory Registers as follows: a. Register of Renewed and Duplicate Share Certificates b. Register of Charges c. Register of Members and Index of Members as maintained by a depository under section 11 of the Depositories Act, 1996 d. Register u/s 186 of the Companies Act, 2013 - (loan/ guarantee/ security or making an acquisition of securities) e. Register u/s 187 of the Companies Act, 2013 - investment held in the name of any other person f. 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 Companies Act, 2013	Permanent
4.	License and Permissions	Permanent
5.	Statutory Forms except for routine compliance	Permanent
6.	Scrutinizers Reports	Permanent
7.	Share certificate forms and related books and documents – Disputed cases	Permanent
8.	Register of Debenture-holders	8 years after the redemption of debentures
9.	Index of debenture-holders	8 years after the redemption of debentures
10.	Annual Returns	8 years from the date of filing with the Registrar of Companies
11.	Attendance Register	8 years
12.	Office copies of Notice of General Meeting and related papers	8 financial years
13.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 financial years
14.	Instrument creating charge or modification thereon	8 years from the date of satisfaction of charge by the company

Sr. No.	Document Type	Preservation Period
15.	All notices in Form MBP-1 for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013	8 years from the end of the financial year to which it relates
16.	Books of account	8 financial years
17.	Any other register/documents required by any law, for the time being in force	8 years or the period as specifically provided for under the relevant Applicable Laws

APPENDIX – B

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of the Responsible Officer