



Transwind

Infrastructures Ltd.

TRANSWIND INFRASTRUCTURES LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS



I. BACKGROUND

SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015 (**“Regulation”**) requires every Listed Company to formulate a policy on Preservation of Documents which has to be approved by the board of Directors.

In this context, the following policy has been framed by the Board of Directors (**“the Board”**) of Transwind Infrastructures Limited with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

This policy can modify and amended if require from time to time with the approval of Board of Directors only.

II. OBJECTIVE OF THE POLICY

The Objective of this policy is to classify the documents, records, and registers of the Company which are required:

- (i) to be preserved permanently
- (ii) to be preserved for a period of not less 8 years

III. DEFINATIONS

“Applicable Law” means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) , The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.

“Books of Accounts” includes records maintained in respect of –

- i. all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place
- ii. All sales and purchases of goods and services by the Company
- iii. The assets and liabilities of the Company; and iv. The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.

“Document(s)” refers to papers, notes, agreements, notices, advertisement, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other records, required or in order to comply with the requirements of any applicable Law, whether issued sent,



the time being in, or otherwise maintained on paper or in electronic form received or kept in pursuance of the act or any other Law for and does not include multiple or identical copies.

“Electronic Record(s)” means the electronic records as defined under clause (t) of Sub-section (1) of section 2 of the Information Technology Act, 2000

“Electronic Form” means on any electronic devise such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval devise, considered feasible, whether the same is in possession or control of the Company or otherwise Company has control over access to it.

“Maintenance” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

IV. APPLICABILITY AND MODES OF PRESERVATION:

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

V. PRESERVATION OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

DOCUMENTS WHICH ARE TO BE MAINTAINED PERMENANTLY:

The Company shall maintain the following documents on a permanent basis:

- a. The original signed and stamp Memorandum and Article of Association of the Company.
- b. Minutes of General Meeting, Board Meeting, and various Committee Meeting.
- c. Register of Members along with index.



- d. Foreign Register of Members, if any.
- e. Register of loan, guarantee, security and acquisition made by the Company
- f. Register of investments not held in its own name by the Company, if any.
- g. Register of contracts with related party and contract etc. in which Directors are interested.
- h. Register of Charges, Register of Directors and KMP.
- i. Any other documents such as, Registration Certificate, License and Statutory Approval, Audited Financial Statements, Material Contract- Agreements, order issued by Courts/ Statutory Bodies, and all other documents as may be required to maintain permanently in terms of applicable laws, maintained and preserve from time to time.

DOCUMENTS WHICH ARE TO BE MAINTAINED FOR ATLEAST FOR A PERIOD OF EIGHT FINANCIAL YEAR

- a. Books of Accounts together with vouchers relevant to any entry in such books of accounts
- b. Copies of Annual Return
- c. Disclosure of Interest received from the Directors of the Company in the manner prescribed.
- d. Attendance Register, Notices, Agenda, Notes on Agenda, and other related papers of General Meeting, Board Meeting, and various Committees Meeting.
- e. Instruments creating charge or modifying charge.
- e. Changes to the Memorandum and Article of Association, if any.
- f. Tax Records including but not limited to documents concerning tax assessment, tax filing, proof of deduction, tax returns, appeal preferred against any claims, made by relevant tax authorities, and shall be maintained for a period of 8 years and such other period longer than 8 years as the company thinks fit to maintain.
- g. Relevant marketing and sales documents.
- h. Press Releases.
- i. Legal documents including but not limited to contracts, legal opinions, pleadings, orders passed by the Courts or tribunals, Judgements, interim order, Documents relating to the cases pending in a court or tribunal or any other authorities empowered to give decision on any matters, awards, Documents, relating to property matters.



VI. MODE OF MAINTANANCE

The Company shall maintain these records either in physical or in electronic mode. The applicable provisions of law, rules and regulation with regards to electronic maintenance of records shall be adhere to. All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under various rules and regulations.

VII. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/ unimportant/ irrelevant.

This apply to both physical or electronic documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shared or otherwise render unreadable confidential paper records; or
- c. Delete or destroyed electronically stored data.

VIII. BACK UP OF DATA:

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

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.
