

Policy on Preservation and Archival of Documents

Background:

In compliance with the Securities and Exchange Board of India's (SEBI) notification dated 2nd September 2015, which introduced the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as the "SEBI LODR Regulations"), listed entities are mandated to establish policies for the preservation and archival of documents.

This policy came into effect from 27.01.2025

Purpose:

The purpose of this document is to establish a policy for the preservation and archival of documents in accordance with Regulation 9 and Regulation 46 of the SEBI LODR Regulations. This policy aims to ensure the protection and preservation of documents in conformity with applicable laws.

Definitions:

- **Applicable Laws:** Refers to securities laws as defined under Regulation 2(1)(zf) of the SEBI LODR Regulations and other laws and statutes applicable to the Company that mandate the preservation of documents.
- **Board:** The Board of Directors of the Company, as constituted from time to time.
- **Company:** "Premier Energy and Infrastructure Limited."
- **Document/s:** Includes all papers, documents, agreements, filings, forms, memoranda, correspondences, records, files, books, etc., of the Company in both physical and electronic formats.
- **Policy:** The Policy on Preservation and Archival of Documents formulated by the Company.
- **SEBI LODR Regulations:** The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any amendments made thereto.

Scope:

All documents of the Company will be maintained in compliance with applicable laws, including the SEBI LODR Regulations. The preservation period for documents will follow the guidance manual of this Policy. This Policy also covers the archival procedures for disclosures made on the Company's website, as required by the SEBI LODR Regulations.

Classification of Documents:

For the purposes of this Policy, documents of the Company are classified into the following categories:

1. Documents that must be preserved permanently (**Annexure- 1**) by the Company (as listed in the Guidance Manual), subject to any modifications, amendments, additions, deletions, or other changes. Such changes must also be permanently preserved.
2. Documents that must be preserved for a minimum duration stipulated in the SEBI LODR Regulations and other applicable laws, which is currently 8 years (**Annexure- 2**), after the

relevant transactions are completed. This is also subject to modifications, amendments, additions, deletions, or other changes to the documents, which must also be preserved for the stipulated period.

Modes of Preservation:

- Documents may be preserved in either physical or electronic form.
- The officer(s) of the Company, generally responsible for ensuring compliance with applicable laws, will be designated as the authorized person(s) responsible for document preservation, as outlined in the Guidance Manual.
- Documents should be preserved in a manner that ensures they remain untampered, unaltered, and free from destruction, thereby maintaining their content, authenticity, utility, and accessibility.
- Preserved documents must be accessible at all reasonable times. Access to these documents may be controlled by the authorized person to ensure the integrity and confidentiality of the documents and to prevent unauthorized access.
- The Company will make appropriate provisions to back up all preserved documents, both in physical and electronic formats.

Destruction of Documents:

After the retention period has expired, documents may be destroyed as recommended by the authorized person and approved by the Managing Director of the Company. The destruction of documents will be recorded in a Register of Disposal of Records, maintained by the authorized person responsible for the disposal. This applies to both physical and electronic documents. Refer **Annexure 3** for the Specimen format of the register of Documents disposed of / destroyed.

Review:

The Policy will be reviewed by the Board and is authorized to amend the Policy as deemed necessary, or in cases where the Company encounters practical challenges in implementing the Policy.

Compliance:

All employees of the Company are required to adhere to the provisions of this Policy and the associated guidance manual. Failure to comply with this Policy and the guidance may result in disciplinary actions, including suspension or termination of employment.

Interpretation:

In any situation where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation, or standard governing the Company, the applicable law, rule, regulation, or standard will take precedence over the provisions of this Policy and its procedures.

Archival Procedure

All disclosures / filings made to stock exchanges pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “SEBI LODR Regulations”) shall be hosted on the website for a minimum period of five years.

Annexure – 1

Indicative List – Documents for permanent preservation:

1. Certificate of incorporation, Certificate of commencement of business, Certificate of change of name (if any)
2. Memorandum and Articles of Association as amended from time to time
3. Minutes Books of General Meetings, Board Meetings and Committee Meetings
4. Statutory Registers except those Registers listed in Annexure - 2
5. All books and documents relating to the issue of share certificates, including the blank forms of share certificates
6. Any other document as may be required to be maintained permanently in terms of the Act and Regulations maintained and preserved from time to time.

Annexure – 2

Indicative List –

Documents with preservation period of not less than 8 years after completion of the relevant transaction:

1. Annual Returns and copies of all certificates and documents required to be annexed thereto
2. Attendance Register
3. Office copies of Notice of General Meeting, scrutiniser's report and related documents
4. Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
5. Statutory disclosures
6. Books of accounts including vouchers relevant to any entry in such books of accounts
7. Disclosures / Notices by a director of his interest
8. Instrument creating a charge or modification
9. Register of debenture-holders including index of debenture-holders (from the date of redemption of debentures)
10. Foreign register of debenture-holders, if any
11. Register of Deposits, if any
12. Any other document as may be required to be maintained in terms of the Act and Regulations, maintained and preserved from time to time.

Annexure – 3

Specimen format of the register of Documents disposed of / destroyed:

Particulars of Document	Date of Destruction	Date of Approval	Initials of the Authorised Person