

DOCUMENT ARCHIVAL POLICY OF SUSTAINABLE ENERGY INFRA TRUST

A. Preamble:

Sustainable Energy Infra Investment Managers Private Limited (“**Investment Manager**”) has been appointed as the investment manager of Sustainable Energy Infra Trust (“**Trust**”), an infrastructure investment trust registered with the Securities and Exchange Board of India (“**SEBI**”) in accordance with the SEBI (Infrastructure Investment Trusts) Regulations, 2014, as amended (“**SEBI InvIT Regulations**”).

The document archival policy (“**Policy**”) aims to provide a comprehensive policy on the preservation and conservation of the records and documents of the Trust. It provides guidance on the preservation and management of documents to help ensure the authenticity, reliability and accessibility of such documents. The policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. It stipulates the duration and manner in and place at which records and documents of the Trust shall be preserved. Accordingly, the Investment Manager has formulated this policy.

B. Type of Documents:

The Trust’s records and documents can be classified as physical and electronic records. Documents can also be categorised into documents to be preserved for limited life span and those to be preserved permanently. Documents preserved for a limited period shall be preserved for a period of not less than eight years after completion of the relevant transaction or any such period as required under applicable law.

Physical records would consist of all the handwritten or printed and signed books and records maintained by the Investment Manager in physical form. Electronic records would comprise of all such documents which are digitally or virtually maintained in the electronic forms. Electronic record shall be authenticated by digital signatures.

C. Place of Preservation of documents and records:

All records and documents along with all the supportive documents which are physically available shall be maintained at the principal place of business of the Trust, presently being ‘Mahindra Towers, Pandurang Budhkar Marg, Near Doordarshan Kendra, Worli, Mumbai 400018’. All the documents required to be maintained in terms of the SEBI InvIT Regulations, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended or supplemented, including any guidelines, circulars, notifications and clarifications framed or issued thereunder (“**SEBI Listing Regulations**”), as applicable, listing agreements, and any applicable law, shall be preserved under the custody of the compliance officer of the Trust.

All financials records required to be maintained in terms of the SEBI InvIT Regulations, prescribed accounting standards, Income Tax Act, 1961 and other applicable law, shall be maintained under the custody of the relevant authorised representative of the Investment Manager.

For paucity of space at the principal place of business of the Trust, data may be kept at an external storage facility, provided that the data so preserved is capable of being easily accessed and retrieved when need be.

D. Method and tenor of preservation:

All the statutory documents shall be preserved for a minimum period of eight financial years, immediately preceding a financial year, and since creation of the Trust, when the Trust has been created for a period of less than eight years; or such longer duration if prescribed under applicable law. Documents shall be preserved in a chronological manner for each financial year. The person in charge of custody of the documents shall be responsible for proper maintenance and safe keeping of documents under his custody. The Trust shall maintain back-up of all documents preserved in the electronic form.

Documents which are confidential in nature shall, wherever possible, be kept under lock and key and shall be shared on need to know basis only with persons directly involved in the transaction involving such documents and records.

E. Inspection and investigation:

If required under applicable law, some of the registers and records may be required to be kept open by the Trust for inspection by directors of the Investment Manager and unitholders of the Trust and by other persons, including creditors of the Trust. Upon receipt of advance notice from a unitholder or from any other specified person the Trust shall facilitate inspection of such documents by such persons and allow extracts to be taken from certain documents, registers and records and to furnish copies of certain documents, registers and records. Such documents and records shall be kept open for inspection during the business hours of the Trust without payment of any fee.

Government and statutory authorities, including the Securities and Exchange Board of India, have the right of access to all registers and records. The Government or any statutory body, may order investigation into the affairs of the Trust and may order seal and seizure of documents and records. In such an eventuality the Trust and its officers shall support and assist the Government or statutory officers in every possible way.

F. Documents hosted on the Trust website:

Documents which are statutorily or regulatorily required to be hosted on the Trust website shall be hosted within the prescribed timeline from the occurrence of the event. All statutory data shall be hosted on the Trust website for a minimum period of five years or for such minimum period as prescribed under applicable law, after which it shall be preserved in the archival folder of the Trust maintained offline, until it is destroyed upon the expiry of the statutory period for the preservation such documents.

G. Register of documents destroyed to be maintained:

Documents and records may be destroyed after the expiry of the statutory period for the preservation the documents, after keeping a suitable record of documents destroyed.

H. Conflict with law:

The policy shall not contradict with the provisions of any applicable law. In case of any discrepancy, the provisions of applicable law shall prevail over the provisions of this policy.

I. Amendment

- i. Any amendment or variation to this Policy shall be approved by the board of directors of the Investment Manager and undertaken in compliance with the SEBI InvIT Regulations and other applicable law.

- ii. Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the SEBI InvIT Regulations, without any action from the Investment Manager or approval of the unitholders of the Trust.

Adopted by Sustainable Energy Infra Investment Managers Private Limited on behalf of the Trust on September 26, 2023.

Certified True Copy

Authorised Signatory

Name: Devjeet Ghosh

Designation: General Counsel and Chief Compliance Officer