



**STL NETWORKS LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS**

Owner:
Secretarial Department

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Archival Policy - 1.0

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The Board of Directors (the “Board”) of STL Networks Limited (the “Company” or “SNL”), has adopted the following policy with regard to Preservation of Documents as required by Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as ‘Listing Regulations’) at its meeting held on March 06, 2025.

1. INTRODUCTION

This policy is primarily framed pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) and Companies Act, 2013 (the “Act”). This Policy deals with preservation/ retention of records and public disclosures of STL Networks Limited (“Company”).

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows-

1. documents whose preservation shall be permanent in nature;
2. documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (1) and (2) in electronic mode.

Besides the above, as per applicable provisions of the Act certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly, this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of the Act which would ensure safe-keeping of the records/documents.

It applies to all Documents, books and papers which include books of account, deeds, vouchers, writings, minutes and registers or any other information, maintained on paper or in electronic form.

3. PRESERVATION OF DOCUMENTS

(A) Preservation of Documents with specific reference to the Act and the Listing Regulations

- 1) the documents whose preservation shall be permanent in nature
 - **Annexure 1** of this policy contain the details of documents whose **preservation shall be permanent** in nature.
- 2) documents with preservation period of not less than eight years after completion of the relevant transactions
 - **Annexure 2** of this policy contain the details of documents with **preservation period of not less than eight years** after completion of the relevant transactions.
- 3) documents with preservation period other than those mentioned in 2) above
 - **Annexure 3** attached herewith contain the details of documents with preservation period **other** than those mentioned in 2) above.



All the documents shall be retained completely in the format in which they were originally generated, sent or received or in a format which shall present accurate information generated, sent or received and the information contained in the electronic records shall remain complete and unaltered.

Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise. The document retention shall also take into account the requirements for business continuity plan in place from time to time.

(B) Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

1) The Company is to maintain a functional website containing

- The basic information about the Company,
- All Information and/or documents as specified in the applicable provisions of the Act,
- All Information and/or documents as specified in Regulation 46 (2) and other relevant provisions of the Listing Regulations,
- All Information and/or documents provided to/ filed with the stock exchanges.

2) The Company shall ensure that contents of the website are correct.

3) Information and/or documents, required to be made available on the website under Regulation 46(2) and other relevant provisions of the Listing Regulations, shall be made available on the website within two working days from the date of dissemination of information and/or documents by the Company, unless specified otherwise (refer Clause 46(3) of Listing Regulations). The Company shall update any change in the content of its website within two working days from the date of such change in content.

4) Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.

a) The information and/or documents may be arranged financial year wise with further segregation into four quarters of the financial year.

b) All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

4. MODE OF MAINTENANCE & STORAGE FACILITY

Documents mentioned in sub clause (A) & (B) of Clause 3 above shall be maintained/ preserved in the manner mentioned below. The Officer of the Company generally Head of the Department or Functional Head or such other person as may be authorized by the Board, shall be authorized person who is expected to observe the compliance of requirements of applicable laws/policy as the case may be.

A. Documents maintained in physical form:

1. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.



2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

B. Documents maintained in electronic form:

1. All documents pertaining to current Financial year and for one preceding financial year shall be maintained on server and timely Backup be maintained periodically. The documents shall be maintained in such a manner that their retrieval is easy and quick.

2. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

5. OBSOLESCENCE & ARCHIVAL OF DOCUMENT

Any document or record which is no longer required shall be trashed or disposed off in such a manner to prevent any misuse. This shall be done after proper authorization from the concerned Functional Head and the same shall be in accordance with the approved Policy, Guidelines and Standard Operating Procedure issued from time to time in this regard.

Archived documents and records must be maintained in safe and secure place to ensure timely and proper retrieval as and when necessary.

6. LOSS OR DAMAGE TO DOCUMENTS

Loss, damage or theft of any Company document or record must be immediately reported to the concerned Line Manager and also the Functional Head for further action as may be necessary in the matter.

7. EMPLOYEE SEPARATION

Upon superannuation or separation for any other reason (transfer, resignation, termination etc.) from the Company, each employee must forthwith return to the authorized official all the Company records and documents (with a complete list of documents, files, papers etc.), in proper condition, which are in his / her custody or control.

8. COMPLIANCE WITH REGULATORY PROVISIONS ETC.

The compliance of applicable rules and regulatory provisions shall always be ensured. In the event of a conflict between the provisions of this Policy and those prescribed under applicable rules and regulations, the latter shall prevail.

9. EXCLUSIONS

Any document or record created in the routine course of working and which is not required to be maintained in terms of applicable rules and regulations will not be governed by this Policy. Further, the Policy does not apply to personal or non-business information.



10. AMENDMENTS

This Policy shall be reviewed as and when considered necessary as per business exigencies of the Company.

11. BREACH OF POLICY

Failure to retain documents or records in appropriate form and manner could expose the Company and its officers to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation. Any person guilty of breaching any of the provisions of the Policy will be subject to such disciplinary action, as may be decided by the Company which may lead to wage freeze, suspension or termination from services of the Company. The disciplinary action taken by the Company will be in addition to any other penalty or re-course as may be prescribed under applicable statute(s) governing such matter or breach.

Annexure - 1

Documents whose preservation shall be permanent in nature

Document	Place of Preservation	Person responsible for custody	Reference of provision	Period
Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013	Registered office		Sec 7(4) of the Companies Act, 2013	Permanent, till dissolution of the company
Register of Renewed and Duplicate Share Certificates	Registered office of the company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose.	Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014	Permanent
Share certificate forms and related books and documents – Disputed Cases	Registered office of the company or at such other place where the said documents are kept	Company Secretary or any other person authorized by the Board for the purpose	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Permanent
Register of Charges	Registered office	Company Secretary	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent
Register of Members along with the index	Registered office of the company or at such other place where the said documents are kept	Company Secretary or any other person authorized by the Board for such purpose	Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Permanent

Foreign Register of Members	Registered office of the company or at such other place where the said documents are kept	Company Secretary or person authorised by the Board	Rule 15 (4) of the Companies (Management and Administration) Rules, 2014	Preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal
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.	Registered Office or at such other place as may be approved by the Board.	Company Secretary	Rule 25(1)(d) & (e) of the Companies (Management and Administration) Rules, 2014 and Secretarial Standards 1& 2 – clause 8.1& 18.1	Permanent
Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)	Registered Office	Company Secretary	Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
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 Act)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose	Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent

Minutes of all the General, Board & Committee Meetings of the transferor Company as handed over to the transferee company.	Registered Office or at such other place as may be approved by the Board.	Company Secretary	8.1& 18.1 (Secretarial Standards-1 & 2)	Permanent
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* Note: The Company may maintain Registers/records though Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.

Annexure – 2

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

A) Mandated under Companies Act, 2013

Document	Place of preservation	Person responsible for custody	Reference of provision	Period
Register of Deposits accepted or renewed	Registered Office		Rule 14(3) of The Companies (Acceptance of Deposits) Rules, 2014	Not less than 8 years from the financial year in which the latest entry is made in the register
Instrument creating charge or modification thereon	Registered Office		Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
Register of debenture holders or any other security holders along with the index	Registered Office or at such other place as may be approved by the Board.	Company Secretary or any other person authorized by the Board for such purpose	Rule 15 (2) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of debentures or securities.
Copies of all annual returns prepared under section 92 of the Act and copies of all certificates and documents required to be annexed thereto	Registered Office or at such other place as may be approved by the Board.	Company Secretary or any other person authorized by the Board for such purpose	Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.

Foreign register of debenture holders or any other security holders	Registered Office or at such other place as may be approved by the Board.	Company Secretary or any other person authorised by the Board for such purpose	Rule 15 (4) &(5) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of such debentures or securities.
All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the financial year to which it relates
The attendance register of Board & Committee Meetings	Registered Office or at such other place as may be approved by the Board.	Company Secretary	4.1.7 of Secretarial standards -1	8 financial years
Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office or at such other place as may be approved by the Board.	Company Secretary	8.2 of Secretarial Standards-1	As long as they remain current or for 8 financial years whichever is later
Office copies of general meeting Notices, scrutinizers report and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office or at such other place as may be approved by the Board.	Company Secretary	18.2 (Secretarial Standards-2)	As long as they remain current or for 8 financial years whichever is later
Books of Accounts	Registered Office or at such other place as may be approved by the Board.	Chief Financial Officer		8 financial years

B) Other Documents mandated under Companies Act, 2013 for Preservation but no time period prescribed

Document	Provision of law	Period of preservation
The postal ballot and all other papers or Registers relating to postal ballot including voting by electronic means	Rule 22 (11) of the Companies (Management and Administration) Rules, 2014	8 financial years

C) Other Documents Voluntarily preserved

Document	Provision of law	Period of preservation
Attendance slips for Annual/ Extraordinary General Meetings	--	8 financial years
Dividend Payment Records	--	8 financial years

* Note: The Company may maintain Registers/records through Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.

Annexure 3

Documents with preservation period as mentioned in last Column of each entry

Document	Person responsible for custody	Reference of provision	Period
Share certificate related books and documents (other than disputed cases)	Company Secretary	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	30 years
Share certificates surrendered to company immediately be defaced by stamping or printing the word "cancelled" in bold letter)	Company Secretary	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	3 years from the date on which they were surrendered

*Note: The Company may maintain Registers/records through Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws