

STEL Holdings Limited

Regd. Office: 24/1624, Bristow Road, Willingdon Island, Cochin - 682003

POLICY FOR PRESERVATION OF DOCUMENTS

I. BACKGROUND

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Regulations**") requires every Listed Company to frame a policy for preservation of documents.

II. DEFINITIONS

"Act" means the Companies Act, 2013.

"Applicable Law" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

"Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

"Electronic Record(s)" means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.

"Electronic Form" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device;

"Listing Regulations" means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (including any modification, amendment or re-enactment thereof.)

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"Officer of the Company" for the purpose of this Policy shall mean the official, employee of the Company or such other person as may be authorized by the Board of Directors of the Company from time to time.

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

III. PRESERVATION OF DOCUMENTS:

In accordance with Regulation 9 of the Listing Regulations, documents which the Company is required to preserve under the Applicable Laws, shall be classified under the following categories and shall also be preserved as mentioned against each category: -

(a) **Documents whose preservation shall be permanent in nature:** Documents, which are required to be preserved permanently, by the Company as per Applicable Laws, shall be preserved permanently, in accordance with the provisions of the Applicable Laws.

(b) **Documents with preservation period of not less than eight years after completion of the relevant transactions:** Documents, which are required to be preserved by the Company for not less than eight years as per Applicable Laws, shall be preserved for eight years from the relevant date or after completion of the relevant transactions, in accordance with the provisions of the Applicable Laws.

(c) **Documents with preservation period of less than eight years after completion of the relevant transactions:** Documents, which are required to be preserved by the Company for less than eight years as per Applicable Laws, shall be preserved for such period as may be prescribed in accordance with the provisions of the Applicable Laws.

(d) Documents pertaining to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter, where there is no such requirement as per Applicable Law, then such documents shall be preserved for such period till the subject matter is closed/completed/settled as the case may be or otherwise.

(e) Documents like License, Registration, and Permission etc shall be preserved permanently, unless the relevant activities/matter is closed and no longer required in future.

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(f) Documents like Deed/Agreements /Ownership right etc in relation to Immovable properties shall be permanently preserved unless such Immovable Properties is no longer properties of the Company.

IV. MANNER OF PRESERVATION:

Documents may be preserved in physical or electronic mode as may be permitted by law. All the possible measures must be taken to ensure the data is secure and safe as the case may be. The Company must take possible/ feasible steps so as to prevent the documents from being damaged / mutilated/ altered/ destroyed. If the documents are in electronic mode, necessary care must be taken to avoid corruption of files and also should have proper back-up of electronic records.

The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person, so as to ensure integrity of the Documents and prohibit unauthorized access.

The Officer of the Company, who is authorised to observe the compliance of requirement of respective Applicable Law and other statute, rules, regulation etc. as the case may be, shall be responsible for the preservation of the Documents in accordance with this policy.

V. MODIFICATION OF POLICY:

In case of any amendments to the Regulations which makes any of the provisions in the Policy inconsistent, the provisions of the Regulations shall prevail. Further, in case there are any regulatory changes, which require modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors of the Company.
