



STL GLOBAL LIMITED

(FORMERLY KNOWN AS SHIVALIK GLOBAL LIMITED)

POLICY ON MAINTENANCE & PRESERVATION OF DOCUMENTS

PREFACE

The Board of Directors (the “Board”) of STL Global Limited (the “Company”) has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy shall be known as “Policy for Maintenance and Preservation of Documents” and shall be effective from 1st December, 2015.

OBJECTIVE

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under the Regulation 9 of the Listing Regulations, 2015

DEFINITION

“**Board of Directors**” or “**Board**” shall mean the Board of Directors of STL Global Limited as constituted from time to time.

“**Company**” shall mean STL Global Limited.

“**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc. and the like as are required to be maintained under any law or regulation for the time being in force.

“**Act**” shall mean the Companies Act, 2013

“**Listing Regulations**” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve documents as specified hereunder:

Category (A): The documents of permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion, or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletion in the documents shall also be preserved permanently by the Company.



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Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure 2**) shall be preserved by the company for a term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, documents may include the following:

- i. 'books and papers' as defined in clause 12 of section 2 of the Act;
- ii. 'books of account' as defined in clause 13 of section 2 of the Act;
- iii. 'documents' as defined in clause 36 of section 2 of the Act;
- iv. 'register of companies' as defined in clause 74 of section 2 of the Act

Further, the company may deeming fit and possible from time to time, maintain above mentioned documents in electronic form to the extent possible.

MODES OF PRESERVATION OF THE DOCUMENTS

- i. The documents may be preserved in physical form or electronic form.
- ii. The officer of the Company required to preserve the documents shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.
- iii. 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
- iv. The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorised person, so as to ensure integrity of the Documents and prohibit unauthorized access.

DISPOSAL/DESTRUCTION OF DOCUMENTS

The temporary documents as listed in **Category (B)**, excluding the current Documents shall be destroyed after the relevant or the prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under Applicable Laws pursuant to which the Documents have been preserved. A register of the Documents disposed/destruction shall be maintained as per **Annexure 3**

ROLES AND RESPONSIBILITY

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy.



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AMENDMENT

Any change in the policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Indicative List

Annexure 1

DOCUMENTS FOR PERMANENT PRESERVATION

- Certificate of Incorporation
- Memorandum & Articles of Association
- Licenses & Statutory Approvals
- Statutory Registers required under applicable laws
- Audited Financial Statements
- Minutes of General Meetings
- Minutes of Board Meetings
- Minutes of various Committee Meetings
- Material Agreements/ Contracts
- Orders issued by Courts/ Statutory Bodies
- Any other documents as may be required to be maintained permanently in terms of applicable law(s), and as maintained and preserved from time to time.

Annexure 2

DOCUMENTS FOR PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

- Books of Accounts
- Annual Returns
- Disclosures made under SEBI (LODR) Regulations, 2015 to the Stock Exchange
- Insurance Policies/ Claims under various policies
- Correspondence with Departments/ Shareholders
- Non-Statutory Registers/ Documents
- All notices pertaining to disclosure of interest of Directors
- Any other document as may be required to be maintained in terms of applicable law(s), maintained, and preserved from time to time.



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Annexure 3

Format of the Register of Documents disposed/destroyed-

Particulars of Documents along with provision of applicable law	Date and Mode of Destruction	Initials of the Authorised Person