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## Archival Policy

### 1. Scope and Purpose

The Steelman Telecom Limited (the “Company”) maintains a website <http://www.steelmantelecom.com> which inter alia contains details of the Company’s business and operations, its Mission, Vision and Values; its Board and various Committee; its corporate policies, its Corporate Governance, sustainability initiatives. The website also hosts information mandated by statutory authorities under various laws, including the Companies Act, 2013 (the “Act”) as amended from time to time and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Regulations”), as amended from time to time.

The policy is based on the principle that information is one of the Company’s most valuable assets and must be disseminated in an objective manner. This Policy provides a framework for ensuring that information relating to the Company is adequately disclosed on its website as required by law and archived for a specified period as per section 4, to facilitate retrieval, if required. In view of the above, the Company has framed this Archival Policy to determine the period for which the information required by the Company to be disclosed on its website, will be hosted on the website and the period for which it will be archived thereafter.

### 2. Obligations and Archival Period

1. Regulation 30(8) of the Regulations requires that a listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.
2. The Company shall, inter-alia, disseminate the following information permanently, on its website, unless otherwise specified herein:
  - a) Details of its business;
  - b) Code of conduct of Board of Directors and senior management personnel;
  - c) Policy on dealing with related party transactions;
  - d) Policy for determining material subsidiaries;
  - e) Policy on determination of Materiality of events/information;
  - f) Policy on Preservation of documents;
  - g) Archival Policy
  - h) Details of familiarization programmes imparted to independent directors;
  - i) Email address of grievance redressal and other relevant details;



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j) financial results, on conclusion of the meeting of the Board of Directors where the financial results were approved;

k) Complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc, will be available for a period of 5 years. Thereafter the information will be stored for an additional period of 3 years. Consequent to completion of such additional period, the information will be removed from the website, at the direction of the Board of Directors of the Company.

l) Shareholding pattern will be available for a period of 5 years. Thereafter the information will be stored for an additional period of 3 years. Consequent to completion of such additional period, the information will be removed from the website, at the discretion of the Board of Directors of the Company.

3. The company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per this policy.

4. All entities falling under promoter and promoter group shall be disclosed separately in the shareholding pattern appearing on the website of all stock exchanges having nationwide trading terminals where the specified securities of the entity are listed, in accordance with the formats specified by SEBI.

### 3. Policy Review

This policy may be reviewed and amended by the management, as and when deemed necessary.

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