

PHOENIX LAMPS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. Purpose:

In terms of the requirements under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations dated September 02, 2015, this Policy is made and adopted and is effective December 1, 2015.

2. Applicability and Responsibility:

The Policy shall apply to all the employees of Suprajit Engineering Limited (“the Company”). All the employees are responsible for maintenance, preservation and disposal of Documents (as defined below) pertaining to their respective areas of job responsibility and duties

Documents: includes Company records, books of account, contracts, emails, communications, summons, notices, registers etc., required to be maintained in the course of and for the purpose of carrying on Company’s business, in pursuance of applicable laws, and maintained in paper and/or electronic form and/or in any other medium.

3. Categorization of Documents for Preservation:

- i. Documents whose preservation shall be permanent in nature
 - Company Law and Company Secretarial Records and Statutory Registers including Minutes of meetings of the Board, Shareholders, Committees, as per the Companies Act, 2013 and as per the Listing agreements with the Stock Exchanges..
 - Licenses, permissions, registrations, approvals from various authorities, unless otherwise stipulated by the concerned authorities.
 - Title/ownership documents in relation to assets (moveable and immoveable) owned or held by the Company.
- ii. Documents with preservation period of at least three years
 - Books of account and Tax records of the Company, or as required under the relevant laws.

- iii. Documents in respect of matters which the Management feels could result in potential litigation shall be marked as 'litigation hold'. The documents pertaining to such matters shall be carefully preserved to handle the litigation effectively, as long as required or as advised by the office of General Counsel.
- iv. All contracts/agreements/deeds etc. executed by the Company in the course of its business should be preserved for at least three years post expiry or termination thereof.
- v. Intellectual Property Records in respect of the concerned IP developed or owned by the Company should be preserved for the entire life of such IP.
- vi. Documents in relation to on-going or potential tax assessments, commercial litigations by or against the Company should be preserved at least until the final disposition of the relevant assessment/litigation, or as advised by the office of General Counsel.
- vii. Employment and related documents including performance reviews etc. should be preserved for at least three years post cessation of employment.
- viii. All other records, filings, papers, disclosures etc. should be preserved as prescribed under the relevant rules, regulations, and laws.

4. Modes of preservation:

The Documents may be preserved in:

- Physical form or
- Electronic Form.

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 with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

5. Suspension of Documents disposal in the event of Litigation or Claims:

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

6. Archival Policy:

- i. This applies to such documents / information hosted and visible to the public on the website of Suprajit Engineering Limited (hereinafter referred as Company) hosting Investor related data which needs to be archived for statutory purposes.
- ii. All material events / information above will be disclosed as soon as practicable as per the Listing Regulations to the Stock Exchanges.
- iii. Such disclosures shall be displayed on the website of the Company for a period of three years from the date of its hosting. The disclosures which are more than three years old will be archived from the website of the Company and will be dealt in an appropriate manner as decided by the Authorized Person(s) from time to time.

7. Miscellaneous:

- i. The process of documentation, preservation, and disposal of Documents shall be as per the standard operating procedure of the Company.
- ii. Documents may be maintained and preserved in paper and/or electronic form and/or other medium unless required to be mandatorily maintained and preserved in paper form under applicable laws or as a consequence of a document preservation requirement.
- iii. The Policy shall be reviewed periodically by management team comprising of Managing Director, Whole-time Director, General Counsel, CFO and Company Secretary and may be amended as deemed necessary or warranted by law, subject to approval by the Board.
- iv. Failure to comply with the Policy may result in disciplinary action including up to termination.

- v. Any queries in relation to this Policy may be addressed to Company Secretary and Compliance Officer of the Company.
- vi. The Policy has been approved by the Board of Directors at their meeting held on 7th November, 2015.

8. Amendment:

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

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