



**POLICY ON PRESERVATION &
ARCHIVAL OF DOCUMENTS**

INDEX

Sr No.	Particulars	Page No
1.	Legal Framework	3
2.	Definitions	3
3.	Mode of Maintenance	4
4.	Policy: (I) Documents whose preservation shall be permanent in nature. (II) Documents whose preservation shall not be less than eight years after completion of the relevant transaction (III) Documents which are to be maintained on website of the company	4
5.	Disposal of records	5
6.	Amendment to the policy	6

Approved on	March 20, 2017
Effective from	April 13, 2017
1st Amendment	May 29, 2025

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

1. LEGAL FRAMEWORK:

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, every 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-

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

Further, with respect to Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, every Listed Company is required to disclose on its website all the material events/ information as disclosed to the stock exchange pursuant to Regulation 46 of SEBI (LODR) Regulations, 2015 for a minimum period of five years and thereafter in terms of the Archival Policy of the Company as disclosed on the website.

With an intent to provide a clear framework and to ensure long-term retention of important records and information, Focus Lighting and Fixtures Limited (“Focus”) at its Board Meeting held on May 20, 2025, amended its Archival Policy as Policy on Preservation and Archival of Documents with an object of classifying various documents, records and registers for the purpose of maintenance, preservation and archiving. It not only covers the various aspects relating to preservation of the Documents but also safe disposal / destruction of the Documents.

2. DEFINITIONS:

“**Act**” means the Companies Act, 2013.

“**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, order, 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, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

“**Electronic Form**” means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“**Electronic Record(s)**” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

“**Maintenance**” means keeping Documents, either physically or in Electronic Form

“**Events or Information**” refers to the information/ events that are required to be disclosed in the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.

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

3. MODE OF MAINTENANCE:

The Company shall maintain these records either in physical or in Electronic Form as the case may be. All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various acts, rules and regulations.

4. POLICY:

Focus has formulated a Policy pursuant to Regulation 9 and Regulation 30(8) read with Regulation 46 of the SEBI (LODR) regulations, 2015 and as per the applicable provisions of the Companies Act, 2013, including Secretarial Standards and other rules and regulations as may be prescribed. This Policy categorizes the records that whose preservation shall be permanent in nature and documents that will be preserved for a specified period of time. All modifications, amendments, additions, deletions to the said documents shall also be preserved by the Company.

I. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

- a. Certificate of Incorporation/ Commencement of Business
- b. Memorandum & Articles of Association
- c. Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013.
- d. Statutory records and registers - Register of loans, guarantee, security and acquisition made by the Company, register of investments not held in its own name by the Company, if any, register of contracts with related party and contracts and Bodies etc. in which directors are interested, Register of Charges, Registers of Renewed and duplicate share certificates, Register of Directors and Key Managerial Personnel.
- e. Agreements made by the Company with Stock Exchanges, Depositories, Authorities etc.
- f. Records relating to various cases and orders thereof
- g. Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
- h. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks shall also be preserved permanently.
- i. Authorization / License and Permissions and Certificates obtained from any statutory authority
- j. Policies of the Company framed under various regulations
- k. Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.
- l. Any other documents as may be applicable under any law, rules or regulation.

II. DOCUMENTS WHOSE PRESERVATION SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION:

- a. Annual Returns as per Companies Act, 2013
- b. Annual financial statements including Annual accounts, Director's report, Auditors report
- c. All disclosures and notices as received from Directors and KMPs along with any amendments
- d. Register of Deposits as per Companies Act, 2013
- e. Register of Allotment (from the date of each allotment) as per Companies Act, 2013
- f. Instrument creating charge or modification
- g. Changes to the Memorandum of Association and the Articles of Association, if any
- h. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- i. E-forms filed with the Registrar of Companies
- j. Books of account together with the vouchers relevant to any entry in such books of account
- k. All agreement entered into by the Company from the date of its termination
- l. Disclosure/Return filed under SEBI LODR Regulations
- m. Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM).
- n. Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI LODR Regulations.

III. DOCUMENTS WHICH ARE TO BE MAINTAINED ON WEBSITE OF THE COMPANY:

- a. All the events/information which have been disclosed to the Stock Exchange under Regulation 30 of the SEBI (LODR), Regulations, shall be hosted or published on the website of the Company for a minimum period of five years from date when it is hosted or published.
- b. The audio recordings and video recordings, if any, of post earnings/ quarterly calls shall be hosted on the website of the Company for a minimum period of two years and preserved for a period not less than eight years.
- c. The transcripts of post earnings/ quarterly calls shall be hosted on the website of the Company for a minimum period of five years and preserved for a period not less than eight years.
- d. The documents/ records/ information hosted on website shall be archived under the heading "Archives" and shall be retained on the Company's website for a period of two years.

5. DISPOSAL OF RECORDS:

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant in physical and/or electronic documents.

6. AMENDMENT TO THE POLICY:

This Policy is based on the existing provisions of the SEBI (LODR), Regulations 2015. The Board of Directors of the Company shall have the authority to amend this Policy if necessary, owing to the changes in the Companies Act, SEBI (LODR), Regulations, 2015 or any other applicable law.