

FOCUS

LIGHTING & FIXTURES LTD.

POLICY FOR PRESERVATION OF DOCUMENTS

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1. BACKGROUND & LEGAL FRAMEWORK:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents /Records maintained by the Company in Electronic Mode or in physical mode.

Regulation 9 of the aforesaid Regulations requires the Board of Directors of the Company to frame a Policy for Preservation of Documents (“Policy”) classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Focus Lighting And Fixtures Limited (“FLFL” / “the Company”) has adopted the Policy for Preservation of Documents by approving in the Meeting of Board of Directors held on March 20, 2017.

This policy is effective from April 13, 2017.

2. DESTRUCTION OF DOCUMENTS:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ Chief Financial Officer. This applies to both physical and electronic documents.

3. POLICY REVIEW:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

4. PRESERVATION OF DOCUMENTS:

The preservation period of eight years starts with the conclusion of financial year in which the document has been formed or the last entry was made.

➤ **Documents whose preservation shall be permanent in nature:**

- a. Common Seal,
- b. Certificate of Incorporation,
- c. Memorandum and Articles of Association,
- d. Minutes of Board Meeting,
- e. Minutes of General Meeting,
- f. Minutes of Committee Meeting,
- g. License and Permissions,
- h. Scrutinizer's Reports on meeting at General Meeting/Postal Ballots,
- i. Annual Audited and Financial Statements,
- j. Forms filed with Registrar of Companies (ROC),
- k. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

➤ **Documents whose preservation shall be for not less than eight years after completion of the relevant transactions:**

- a. Statutory Registers as applicable to the company,
- b. Annual Returns,
- c. Board Agenda and supporting documents,
- d. Attendance Register,
- e. Office copies of Notice of General Meeting and related papers,
- f. Office copies of Notice of Board Meeting / Committee Meeting,
- g. Notes on Agenda and other related papers,
- h. All notices pertaining to disclosure of interest of directors,
- i. Instrument creating a charge or modification,
- j. Books of accounts, financial statements, etc.,
- k. Resolutions passed by circulation.