

OBJECTIVE

The purpose of this policy is to provide a security framework that will ensure the protection of Information from unauthorized access, loss or damage while supporting the open, informationsharing. Information may be verbal, digital, and/or hardcopy, individually-controlled or shared,

stand-alone or networked, used for administration, or other purposes.

SCOPE

This Information security policy is applicable to all the employees of Saptagir (including

independent contractors, temporary workers and similar).

RESPONSIBILITIES

The responsibility of implementing the contents of the policy and to make the necessary update

as per the requirement lies with the management.

POLICY

SCPL appropriately secures its information from unauthorized access, loss or damage while

supporting the open, information-sharing.

1. Restricted Information

Sharing of Restricted information within the Company may be permissible if necessary to meet

the business needs. Except as otherwise required by law (or for purposes of sharing between

law enforcement entities), no Restricted information may be disclosed to parties outside the

Company, including contractors, without the proposed recipient's prior written agreement

(i) to take appropriate measures to safeguard the confidentiality of the Restricted information;

(ii) not to disclose the Restricted information to any other party for any purpose without prior

written consent or a valid court order

In addition, the proposed recipient must abide by the requirements of this policy. Any sharing of

Restricted information within the Company must comply with policies of the Company.

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2. Confidential Information

The Information which falls outside the Restricted information, but is not intended to be shared freely within or outside the Company due to its sensitive nature and/or contractual or legal obligations. Examples of Confidential Information include all non-Restricted information contained in personnel files, internal financial data, procedures, records etc.

Sharing of Confidential information may be permissible if necessary to meet the business needs. When disclosing Confidential information to outside parties, the proposed recipient must agree

- (i) to take appropriate measures to safeguard the confidentiality of the information
- (ii) not to disclose the information to any other party for any purpose without Company's written consent

3. Unrestricted Within Company

Information is classified as Unrestricted Within Company if it falls outside the Restricted and Confidential classifications, but is not intended to be freely shared outside the Company.

The presumption is that this information will remain within the Company. However, this information may be shared outside the Company if necessary to meet the business needs, and the proposed recipient agrees not to re-disclose the information without the Company's consent.

4. Publicly Available

The Information is classified as Publicly Available if it is intended to be made available to anyone inside and outside of the Company.



Protection, Handling, and Classification of Information

- 1. Based on its classification, Information must be appropriately protected from unauthorized access, loss and damage.
- 2. Handling of Information from any source other than Company may require compliance with both this policy and the requirements of the individual or entity that created, provided or controls the information.
- 3. When deemed appropriate, the level of classification may be increased or additional security requirements imposed beyond what is required by the Information Security Policy.

5. Responsibilities

All the employees and others granted use of the Company's Information with the below expectations / requirements:

- Understand the information classification levels defined in the Information Security Policy.
- As appropriate, classify the information for which one is responsible accordingly.
- Access information only as needed to meet legitimate business needs.
- Not divulge, copy, release, sell, loan, alter or destroy any Information without a valid business purpose and/or authorization.
- Protect the confidentiality, integrity and availability of Information in a manner consistent with the information's classification level and type.
- Safeguard any physical key, ID card, computer account, or network account that allows one to access Information.
- Discard media containing information in a manner consistent with the information's classification level, type, and any applicable retention requirement. This includes information contained in any hard copy document (such as a memo or report) or in any

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electronic, magnetic or optical storage medium (such as a memory stick, CD, hard disk, magnetic tape, or disk).

- Contact the management prior to disclosing information or prior to responding to any litigation or law enforcement subpoenas, court orders, and other information requests from private litigants and government agencies.
- Contact the management prior to responding to requests for information from regulatory agencies, inspectors, examiners, and/or auditors.

This policy shall be reviewed for every three years or before based on the necessity for its suitability and updated as necessary.

Approved by

J. Vijaya Kumar (Director) Version: March 2020

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