

Document	Legal Manual	Doc Ref	EID POLICY ON INITIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 1 of 8

**STANDARD OPERATING PROCEDURE (SOP)
FOR
LEGAL PROCEEDINGS**

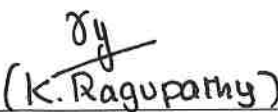


PURPOSE

To effectively file, defend, follow-up and manage the Litigations filed by or against the Company and provide timely advise on Litigations/legal matters thereto.

Litigations involving statutory non-compliance may lead to prosecution of the Company's Directors and Officers in the Court of law and may invite imprisonment including penalty and damages. Similarly, some litigations may lead to serious consequences like closure of factory or inviting high penalty, charges and costs for the Company due to misinterpretation or wrong interpretation of any law/Rules/GO by any authority affecting the viability of any business. Hence, it is utmost important that any litigations are handled with the best domain knowledge expert in the Legal Arena and by the best of the counsels available and all records/documents to be properly prepared and pleaded in the Court of Law. The paramount objective and purpose should be to win the litigations and the case is decided in favour of the Company and the interest of the Company is fully protected.

BACKGROUND

The Constitution of India gives all citizens the right to litigate against any person, who has wronged another person in some way. The legal definition of "litigate against" is to bring a lawsuit or defend oneself against a lawsuit in a court of law. By filing a lawsuit, one can seek justice for the losses/damages one might have incurred or likely to incur because of the actions of another person. The Company during the course of its operations may have to claim money, compensation, protect its rights/property/assets/ receivables etc from another person, whether under a contract or as prescribed under applicable Law or otherwise. Usually disputes, controversy or claim may arise out of or relating to any Agreement or the

Prepared by	Approved by	
 (K. Ragupathy)		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director



Document	Legal Manual	Doc Ref	EID POLICY ON INTIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 2 of 8

breach, termination, or invalidity thereof or noncompliance of applicable law. Always the Company endeavor to solve the same in an amicable manner in consonance with the spirit of the transaction. If, however, the parties fail to resolve such disputes through discussion, the same shall be subject to litigation. Litigation is the process of taking a dispute to a court of law. If parties cannot agree between themselves about the fair and proper outcome of a dispute, they will present their respective cases to a court for its judgment. It is a broad term that describes a long and sometimes complex process. There are a wide range of cases which can be resolved using litigation, which can include:

- Commercial disputes e.g. claims for breach of contract such as damaged goods or recovery of debts;
- Claims against the State e.g. Any decision/order/ enactment/action of any statutory authority or agency having impact/effect on the business or commercial interest of the Company;
- Personal injury claims e.g. monetary claims arising out of an accident where a person suffered harm;
- Employment disputes.
- Property related disputes.



1. LITIGATION INITIATED BY THE COMPANY

- 1.1 The concerned department to apprise the particular issue in comprehensive details to the Legal Dept. Such information must be provided to Legal Dept within a reasonable time frame along with all background papers.
- 1.2. The Legal Department to discuss the issue with the person/s acquainted with the issues and also with the Counsel, wherever necessary.
- 1.3. The concerned department to share all relevant documents and as may be asked by the Legal Dept.
- 1.4. Based on the documents/discussion, Legal Dept will analyze the merits and demerits of the issue/s and advise on whether the dispute to be resolved by mutual negotiation or to initiate litigation.

Prepared by	Approved by	
		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director

Document	Legal Manual	Doc Ref	EID POLICY ON INTIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 3 of 8

- 1.5. In all matters, where the Company's interest, financially or otherwise is adversely affected or likely to be adversely affected, the Company will have to pursue litigation to enforce its rights after consulting with the Legal Counsel on merits and likelihood of success and the decision of the Legal -Head shall be final in the matter.
- 1.6. If, it is advised by the Legal Dept to initiate a litigation, the concerned Dept will coordinate with the Legal Dept to prepare Application/Petition and all documents/ papers should be furnished to the Legal Department within a reasonable time frame.
- 1.7. Heads of Departments must ensure that full co-operation and support is given to Legal Dept in all legal matters, and they go through the application/petition and check all facts/figures and the prayer sought for.
- 1.8. Legal Dept will engage a Legal Counsel/Law firm and will coordinate with him/it for preparing Affidavit/Application/Petition and other documents.
- 1.9. If necessary, Legal Dept may, get a Legal opinion from a Legal Counsel/Law firm before advising the concerned Department to initiate litigation.
- 1.10. The complete cycle of a litigation depends upon the nature of litigation, however, generally, may comprise of the following stages, viz.
 - i. Issuance of Notice to the other party.
 - ii. Receipt of reply, if any.
 - iii. Reminder notice, if necessary.
 - iv. Filing of Pleadings like Suit/Writ Petition/Application before the competent court of law.
 - v. Written/Counter/Reply statement to be filed by the other party/ies.
 - vi. Rejoinder
 - vii. Submission of relevant/supporting documents.
 - viii. Examination of parties/witnesses/documents.
 - ix. Arguments by Legal Counsel of both parties.
 - x. Passing of Final Order/Judgement.

Prepared by	Approved by	
		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director

Document	Legal Manual	Doc Ref	EID POLICY ON INITIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 4 of 8

- 1.11. Legal Dept will ensure timely filing of the case and continuous follow-up from time to time and keep informed of the Managing Director of any new litigation and key developments, if any, from time to time.
- 1.12. Legal Dept will maintain a data base for the Litigations and update it regularly.

2. LITIGATION AGAINST THE COMPANY

- 2.1 The concerned department to inform the Legal Dept, immediately on receipt of any Notice/Summon/Letter from any person/authority.
- 2.2 Such intimation must be provided to Legal Dept immediately on the same day the Notice/Summon/Letter is received first by mail followed by original hard copy.
- 2.3 Discussion between the Legal Dept and the Department/person/s acquainted with the facts of the case/issues.
- 2.4 Sharing of all relevant documents to the Legal Dept by the concerned Dept.
- 2.5 Based on the documents/discussion, Legal Dept will analyze the merits and demerits of the issue/s and advise on defending the litigation.
- 2.6 Legal Dept will engage a Legal Counsel/Law firm and will coordinate with him/it.
- 2.7 Concerned Dept will coordinate with the Legal Dept to prepare Written statement/Reply/Counter statements.
- 2.8 Legal Dept will ensure timely filing of Written/Reply/Counter statements and continuous follow-up till the matter reaches its logical conclusion.
- 2.9 Legal Dept will maintain a data base for the Litigations and update it regularly.
- 2.10 The Concerned Department to keep informed the Managing Director and the Finance Department, if there is any financial Claim involved in the Litigation. The Finance Department has to explore and consider, whether to consider the Claim as contingent liability and make appropriate accounting and disclosure, as may be necessary in the matter.

Prepared by	Approved by	
		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director

Document	Legal Manual	Doc Ref	EID POLICY ON INTIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 5 of 8

3. APPEALS/REVIEW



- 3.1. Legal Dept will consider and examine the necessity of challenging any adverse Order/Judgement of a lower court/forum before the higher court like High Court or Supreme Court, or file review petition.
- 3.2. Legal Dept will ensure that such Appeal/Review is preferred on time, i.e. within limitation period.
- 3.3. If necessary, Legal Department to obtain external counsel's opinion on the matter.

4. REPORTING

- 4.1 All material litigations are to be reported annually to the Board of Directors as mandated by the Board of E.I.D.-Parry (India) Ltd.
- 4.2 Any movements in the material Litigations /new material litigation are also to informed to the Board of Directors quarterly at every Board Meeting.
- 4.3 At the year end, all the litigations along with financial implications and the Counsel's opinion thereon are to be shared with the Statutory Auditors of the Company and also to the Finance Department for arriving at the Contingent Liability, if any, to be reported in the accounts or to ascertain the requirement of any provision.
- 4.4 Legal Department to write to all the Counsels as on 31st March every year and sought their opinion on all the material cases and the way forward.
- 4.5 Any Material Litigation having materially adverse effect to be informed to the Bankers/Debenture Trustees and to the Stock Exchanges based upon the Agreement/Contract and applicable law.

5. COUNSEL FEE

- 5.1 The Legal Department to prepare a Legal Budget every year and make a reasonable estimate of the amount to be spent for existing litigations based upon the forecast and chances/reasonability of hearing as well as earmark

Prepared by	Approved by	
		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director

Document	Legal Manual	Doc Ref	EID POLICY ON INITIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 6 of 8

certain amount for proposed litigations, which may be necessary, if circumstances arise.

- 5.2 For any litigation, endeavor should be made to engage the Company's existing Legal Counsel/Firms unless domain expert is available by other Legal Counsels/ firms. In case any Senior Counsel to be engaged in any matter based upon the severity of the case, the concerned decision to be taken by the Advocate on Record and Fees negotiation to be carried out by the Advocate on record. For any litigations involving the Industry overall, the Company will generally endeavor to go by the Counsel selected by the Industry Association in the best interest of the Company.
- 5.3 All fees/expenses to be paid and counsels to be selected for any litigations is to be approved by the Head- Legal.

		Recommendation	Approval
1	Amount less than Rs.25,000	Sr. Manager- Legal	AGM- Legal
2	Amount above Rs.25,000 up to Rs. 4,00,000/- per hearing	AGM-Legal	Head- Legal
3	Amount above Rs. Rs. 4,00,000/- per hearing	Head- Legal	Managing Director
4	Amount exceeding the Legal Budget		Chief Financial Officer Managing Director

6. ADHERENCE TO TIMELINE

- 6.1 Timely attendance to any issue/documents concerning litigation is of utmost importance and may lead to serious adverse outcome or consequences concerning the Company or its officers unless attended to immediately.

Prepared by	Approved by	
		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director

Document	Legal Manual	Doc Ref	EID POLICY ON INTIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 7 of 8

- 6.2 Hence, concerned Dept shall intimate Legal Dept of any legal issue immediately on arising of the issue especially when the Company needs to defend any litigation.
- 6.3 Legal Dept will ensure that the Affidavit/Application/Petition/Written statement/ Reply statement is/are filed on time with all facts correctly and in a proper manner with due consultation with the person/department involved in the matter.
- 6.4 Any development pertaining to the Litigations shall be intimated by the concerned Dept to Legal Dept immediately or within a reasonable time, as the case may be and shall also be tracked by the Legal Department separately.
- 6.5 Any relevant correspondence/email/letter shall be promptly shared by the concerned Dept to Legal Dept.
- 6.6 Every day the Legal Department to check the concerned website or have Mobile connectivity as per the relevant software available with the concerned court to get messages/ to know about the listing of any case and inform the Advocate immediately..
- 6.7 All legal cases to be physically/electronically attended to by the Representatives from the Legal Department.

7. RECORDS MANAGEMENT & UPDATION OF DATABASE

- 7.1 Legal Dept shall maintain a separate data base for the Notices/ Files/Documents/Records pertaining to Litigations.
- 7.2 Legal Dept shall update such files/documents/records on regular basis both physically and in ELCM.
- 7.3 After the legal proceedings are over, a complete set of documents pertaining to the matter to be made in book bind form and kept for storage and retrieval.

Prepared by	Approved by	
		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director

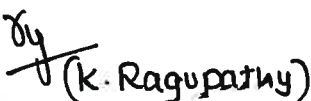

Document	Legal Manual	Doc Ref	EID POLICY ON INTIATING/DEFENDING LEGAL PROCEEDINGS
Company	E.I.D.-PARRY (INDIA) LIMITED	Issue No. / Date	Legal/001 / 01 Jan 2022
Part Title	Litigation Management	Revision No./Date	Legal/001/01 Jan 2023
Chapter Title	Standard Operating Procedure- Legal Proceedings	Page No.	Page 8 of 8

8. OVERRIDING EFFECT

If there is any inconsistency or ambiguity between this Standard Operating Procedure and provisions of any law, this SOP shall be deemed to be amended, and interpreted accordingly.

9. IMPLEMENTATION & REVIEW

This SOP shall be effective from the date of signature and shall be reviewed, whenever the need arises.

Prepared by	Approved by	
 (K. Ragupathy)		
LEGAL	Biswa Mohan Rath Head- Legal/Company Secretary	S. Suresh Managing Director