

THE SWASTIK SAFE DEPOSIT & INVESTMENTS LIMITED

Policy:	Investment Policy
Date of Approval:	June 12, 2017
Approving Authority:	Board of The Swastik Safe Deposit & Investments Limited
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THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LIMITED

This statement of investment policy was adopted by the Board of Directors of The Swastik Safe Deposit and Investments Limited ("SWASTIK") to provide for the creation of, and guidelines for the management of, various funds held by the organization. These policies supersede any and all prior actions regarding investment policies. For the purposes of managing investment risk and to optimize investment returns within acceptable risk parameters, the following funds will be created and held as separate investment pools.

In compliance with the guidelines issued by RBI under the Prudential Norms, this document lays down the policy of the Company and the guidelines to be adhered to while undertaking investment transactions for deployment of funds.

The policy is framed with the following objectives:-

1. Effectively manage and invest the funds in the permitted investments for the duration available.
2. Effectively manage and invest the other surplus funds which may be available comparatively for a longer period.
3. Effective management of interest rate risk by adopting certain maturity pattern.
4. Effective Internal Control on the operations/execution of Investment Transactions.
5. Proper recording/accounting of the investment transactions.
6. Effective reporting of the Investment transaction to the Management

For meeting the above objectives, the following policy will be followed:

1. Regulations

The Company will strictly adhere to various guidelines as may be stipulated by the Reserve Bank of India (RBI) from time to time and also with the provisions of the Companies Act, 2013. All investment decisions of the Company shall be taken by any one of the Directors.

2. Category of investments:-

The following list represents the current range of investments that SWASTIK will consider and which shall be authorized for the investment of funds:

- a) Debentures (Secured/Unsecured/Convertible/Non-Convertible)
- B) Mutual Funds – Income Funds /Liquid Funds
- b) Fixed Deposits and Certificate of Deposits of scheduled commercial banks and Financial Institutions;
- c) Government Bonds;

d) Bonds issued by Semi-Government, Quasi-Government and/ or Public Sector Undertakings having highest credit rating issued by a SEBI registered rating agency;

e) Government Treasury Bills;

f) Rated Commercial Papers having highest credit rating by a SEBI registered rating agency;

3. Operational procedure:-

a) Accounts and Finance Department will be identifying the surplus funds on daily basis and inform Director.

b) Director will give advice for proper deployment of the surplus funds after taking into consideration the present yield on various mutual funds /bank deposits

c) Proper Management approval will be obtained for such deployment of surplus funds before investment is done by Finance Accounts and Finance Department

d) Whenever funds are required for lending activities, Accounts and Finance Department will seek the advice of Director for redemption of mutual funds from the existing portfolio.

e) Approval of director will be obtained for such redemption by the Accounts and Finance Team

4. Criteria for Classification

At the time of making investment, the investment so made by the Company has to be classified into two criteria:

a) Short Term Investment

An asset is classified as short term when it satisfies any of the following criteria:

i. It is expected to be realised in, or is intended for sale or consumption in, the Company's normal operating cycle;

ii. It is held primarily for the purpose of being traded;

iii. It is expected to be realised within 12 months after the initial investment;

iv. It is cash or cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least 12 months after the investment date;

b) Long Term Investment

All other assets are classified as Long Term investments.

5. Valuation of Investments

The cost of the investment(s) will include the acquisition charges such as brokerage, fees and duties.

This Policy is approved by Directors.