

M/s Supra Pacific Financial Services Ltd

Policy on Loans to directors, senior officers and relatives of directors –

Approved vide DBR /2022-23 Dated /03/2023

As per Scale Based Regulation (SBR): A Revised Regulatory Framework for NBFC RBI/2021-22/112 DOR.CRE.REC. No.60/03.10.001/2021-22 dated October 22, 2021 NBFC-Base Layer shall have a Board approved policy on grant of loans to directors, senior officers and relatives of directors and to entities where directors or their relatives have major shareholding. This policy is formulated based on this direction.

M/s Supra Pacific Financial Services Ltd is a company formed under Company Act 1956 and listed in Mumbai Stock Exchange No loans to any of the directors, Senior officers and relatives of directors and to entities where directors or their relatives have major shareholding will be given. The relative's definition will be as per RBI Direction

PART I, Section I, para 8 (b) II (iii)) Definition of "relative" as given in Section 6 of Companies Act, 1956.

A person shall be deemed to be a relative of another, if, and only if:

- (a) they are members of a Hindu undivided family; or
- (b) they are husband and wife; or
- (c) the one is related to the other in the manner indicated in Schedule IA (as under)
 - 1. Father.
 - 2. Mother (including step-mother).
 - 3. Son (including stepson).
 - 4. Son's wife.
 - 5. Daughter (including step-daughter).
 - 6. Father's father.
 - 7. Father's mother.
 - 8. Mother's mother.
 - 9. Mother's father.
 - 10. Son's son.
 - 11. Son's son's wife.
 - 12. Son's daughter.

13. Son's daughter's husband.
14. Daughter's husband.
15. Daughter's son.
16. Daughter's son's wife.
17. Daughter's daughter.
18. Daughter's daughter's husband.
19. Brother (including step-brother).
20. Brother's wife.
21. Sister (including step-sister).
22. Sister's husband

Senior officers applicable under this policy will be Managing Director & CEO, Chief Operating Officer, Chief Compliance Officer, Chief Financial Officer, Company Secretary and Business Head presently and any Senior level officers appointed hereafter.

In addition to what is stated above any direction from any of the regulators with reference to sanctioning of loans to directors or Senior Management to be considered as part of policy and binding on the Company.