



POLICY ON NCD ISSUANCE

Version 3.00 Approved by Board DBR/23/2023-2024

Dept CS-02 Policy no. SPFSL/Policy No.2/CS-02 Approval date 05.08.2024

Policy On NCD Issuance

1. RBI through its Master Direction directed NBFCs shall put in place a Board approved policy for resource planning which, inter-alia, shall cover the planning horizon and the periodicity of private placement. In concurrence of the same we have formulated this policy for private placement of NCDs

2. The issues shall be governed by the following instructions:

- i. The minimum subscription per investor shall be ₹20,000 (Rupees Twenty thousand only);
- ii. The issuance of private placement of NCDs shall be in two separate categories, those with a maximum subscription of less than ₹1 crore and those with a minimum subscription of ₹1 crore and above per investor;
- iii. There shall be a limit of 200 subscribers for every financial year, for issuance of NCDs with a maximum subscription of less than ₹1 crore, and such subscription shall be fully secured;
- iv. There shall be no limit on the number of subscribers in respect of issuances with a minimum subscription of ₹1 crore and above; the option to create security in favour of subscribers shall be with the issuers. Such unsecured debentures shall not be treated as public deposits as defined in these Directions.
- v. M/s Supra Pacific Financial Services Ltd shall issue debentures only for deployment of funds on its own balance sheet and not to facilitate resource requests of group entities / parent company / associates.
- vi. M/s Supra Pacific shall not extend loans against the security of its own debentures (issued either by way of private placement or public issue).

3. Tax exempt bonds if any offered by M/s Supra Pacific Financial Services Ltd are exempted from the applicability of this policy and it will be as per the directions of RBI