SIL INVESTMENT LIMITED

INVESTMENT POLICY

INTRODUCTION & OBJECTIVE

SIL INVESTMENTS LIMITED ("SIL") being a registered Non Banking Financial Company, was granted certificate of registration as NBFC-ND-SI w.e.f 22.05.2009 by RBI, Jaipur. One of the main object of SIL Investments Limited (herein after referred to as "Company" or "SIL) is to "To carry on the business of Investment Company and for that purpose to invest in and acquire hold and deal in shares, stocks, debentures, debenture stocks, bonds, obligations, securities............".

Most of the investments held by SIL since the date of Registration as a NBFC, were in the nature of a legacy, arising out of investments made by the erstwhile Sutlej Industries Limited before the demerger effected in 2006. Therefore, the Company emerged preponderantly as an investment based entity, with its main income as dividend income. In later years, that SIL entered loan financing by leveraging its investment portfolio, to earn interest income. Today the mainstay of SIL's topline is interst income, albeit through leveraging of its core asset, i.e. investments.

Following broad guidelines have been framed by SIL to inform its investment decisions in order to conform with the Non-Banking Financial (Non-Deposit Accepting or Holding) Companies Prudential Norms (Reserve Bank) Directions, 2007. Meeting of the long-term investment goals of the Company basically depends on a number of factors, which not only include fund availability and rate of return, but also inflation and taxes. The motive of the Company to hold the investments is to get returns out of the investments, which can be in any of the following manner:

1. Return on investments in the form of Dividend and/or interest;
2. For capital appreciation;
3. For other benefits.

<u>REGULATION</u>

1. During the course of its operations, the Company will strictly adhere to various guidelines as may be stipulated by the Reserve Bank of India (RBI) from time to time. These guidelines will include:
   - Non Banking Financial Companies Prudential Norms (Reserve Bank) Directions, 2007, as amended upto date.
   - Clarifications as may be issued from time to time by Reserve Bank of India.
2. The Company will also adhere to the provisions of the Companies Act, 1956. However being an Investment Company, engaged in the business of acquisition of shares, stock, debentures or other

securities, the provisions of Section 372A of the said Act [Section 186 of the Act of 2013] are not applicable to the Company.

3. Any statutory modifications in the Statutory guidelines / norms / clarifications/ regulations, or if there is any change in any of the parameter(s) framed by the Board, then the parameter change mutatis mutandis.
4. All investment decisions of the Company shall be taken only at the meetings of the Board of Directors of the Company. The Board of Directors of the Company, may however, delegate the said power to any committee of directors, the managing director, the manager or the principal officer (hereinafter collectively referred to as the "delegate") of the Company. The said resolution of the Board shall specify the total amount upto which the funds may be invested and the nature of the investments which may be made by the delegate.

CLASSIFICATION OF INVESTMENTS

The Investments, that the Company will hold, will be treated as the assets of the Company held with the motive of earning income by way of dividend, interest, and / or for capital appreciation and / or for other benefits. The investments of the Company shall be classified into the following two categories:

Current Investments	The investments made by the Company which are intended to be held for not more than one year from the date on which such investment is made and which are by its very nature are readily realisable.
Long term Investments	Any other investment other than the aforesaid current investments will be construed as long term investment

The Investment of the Company in securities shall be classified into current and long term, at the time of making each investment.

TRANSFER OF INVESTMENTS

The Company shall not make any inter class transfer on ad hoc basis. If the inter class transfer is warranted than it shall be effected only at the beginning of each half-year, on April 1 or October 1, with the approval of the Board.

The investments shall be transferred scrip-wise, from current investments to long-term investments or vice-versa, at book value or market value, whichever is lower.

VALUATION

A. General

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

2. If the Company acquires (fully or partly) any investment, by issue of shares or other securities, the acquisition cost will be the fair value of the securities issued.
3. If the Company acquires any investment in exchange, or part exchange, for another asset, the acquisition cost of the investment will be determined by reference to the fair value of the asset.
4. If the Company subscribes for any right shares offered, the cost of the right shares is added to the carrying amount of the original holding. If rights are not subscribed for but are sold in the market, the sale proceeds are taken to the profit and loss statement.
5. If the Company acquires investments on cum-right basis and the market value of investments immediately after their becoming ex-right is lower than the cost for which they were acquired, it may be appropriate to apply the sale proceeds of rights to reduce the carrying amount of such investments to the market value.
6. The Company may treat the Interest and dividends in connection with the investments in any of the following ways:
    - ❖ As income, being the return on the investment.
    - ❖ Recovery of cost.

B. Quoted Current Investments

The quoted current investments shall, for the purposes of valuation, be grouped in the following categories:

(a) Equity Shares

(b) Preference Shares

(c) Debentures and bonds

(d) Government securities including treasury bills

(e) Units of mutual funds and

(f) others

The quoted current investments for each category shall be valued at cost or market value, whichever is lower. The investment in each category shall be considered scrip-wise and the cost and market value aggregated for all investments in each category. If the aggregate market value for the category is less than the aggregate cost for that category, the net depreciation shall be provided for or charged to the profit and loss account. If the aggregate market value for the category exceeds the aggregate cost for the category, the net appreciation shall be ignored. Depreciation in one category of investments shall not be set off against appreciation in another category.

C. Unquoted Current Investments

1. The unquoted equity shares in the nature of current investments shall be valued at cost or break-up value, whichever is lower. However, if required, the Company may substitute fair value for the break up value of the shares. Further, where the Balance Sheet of the investee company is not available for two years, such shares shall be valued at one rupee only.
2. The unquoted preference shares in the nature of current investments shall be valued at cost or face value, whichever is lower.
3. The investment in unquoted Government securities or Government guaranteed bonds shall be valued at carrying cost.
4. Unquoted investments in the units of mutual funds in the nature of current investments shall be valued at the net asset value declared by the mutual fund in respect of each particular scheme.
5. Commercial papers shall be valued at carrying cost.

D. Long-Term Investments

A long term investment shall be valued in accordance with the Accounting Standard issued by ICAI.

> **Note:** Unquoted debentures shall be treated as term loans or other types of credit facilities depending upon the tenure of such debentures for the purpose of income recognition and asset classification

DEPRECIATION AND APPRECIATION

The depreciation, if any, in each scrip shall be fully provided for and appreciation, if any, shall be fully ignored. The depreciation in one scrip shall not be set off against appreciation in another scrip, at the time of inter class transfer, even in respect of the scrips of the same category.

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