LOAN/ INTER CORPORATE DEPOSIT POLICY

Adventz Securitities Enterprises Limited (the Company) is registered as Non-Banking Financial Company with Reserve Bank of India. Under the RBI's scale-based regulatory structure, the Company's holding/parent company is classified as a Middle Layer NBFC, and the Company is, consequently, also placed in the Middle Layer (NBFC-ML). The Company is into the business of investment and providing financial assistance on short and long term. This Policy will be applicable to the Company with effect from 1st April, 2018, and stands updated to align with the Reserve Bank of India Master Directions for NBFCs issued on November 28, 2025 (as amended from time to time), including the Directions on Credit Risk Management and Concentration Risk Management applicable to the Company as a Middle Layer NBFC.

Keeping in view the nature of business, the Company has framed a Loan/ Inter-corporate Deposits (ICDs) Policy as enumerated below:

1. Company will grant the Loans/ Inter-Corporate Deposits (ICDs) to the corporate entities having good track record, financial soundness and/or good rating. No loans will be given to partnership firms, LLPs and/or individuals. Staff loans/advances fall outside the purview of this Loan Policy.

2. Company provides a cutoff date i.e. 1 to 7 days within which the repayment of ICDs shall be demanded or called up.

3. Each borrower shall provide the duly signed copy of loan application form and provide the documents, as mentioned therein. A loan request letter along with the loan application form shall be mandatory for availing the loan/ICD. Further the borrower shall accept all the terms and conditions as required by the Company.

4. The Loans/ ICDs shall be approved/sanctioned by the Sanctioning Authority, keeping in view the provisions of the said policy, as per details given below. The Sanctioning Authority is further delegated power to record specific reasons in writing at the time of sanctioning any Loans/ICDs, if the cut-off date for demanding or calling up such is stipulated beyond a period of one year from the date of sanction.

Limits (Rs. in crores)	**Approval**	**Final Sanction**
0-5	Any one of the Directors/Board of Director as a whole	Board as a whole
Over 5	Any one of the Directors/Board of Director as a whole	Board as a whole

5. The maximum maturity on Loans/ ICDs will be for one year with the option to renew, with the same or modified terms.

6. The Rate of Interest shall be based on the net worth and credit worthiness of the borrower, as well as the prevailing Market Rates. Rates are further benchmarked to the immediate average yield on a 10 years Government bond.

7. Such interest shall be payable by the Borrowing Party, based on the prevailing business practices and as may be mutually decided.

8. The Sanctioning Authority shall, record specific reasons in writing at the time of sanctioning the Loan/ ICDs, if no interest is stipulated or a moratorium is granted for any period. The Compliance Officer is duly authorized to sign loan documents.

9. The Board of Directors shall periodically review the performance of the ICDs advanced and renewed by the Sanctioning Authority and shall place a report at the end before the Board in their subsequent meeting.

10. The terms of renewal will depend upon the satisfactory performance of the account during the loan period and the business performance of the Parties.

11. The policy can be altered/revised as per changed market scenario and/or statutory guidelines by the Board of Directors of the Company.

12. No ICDs/Loans will be provided against security of Gold / Ornaments.

13. This policy should always be read in conjunction with the RBI guidelines, directives, and instructions. The company will apply best industry practices so long as such practice does not conflict with or violate the RBI guidelines.

14. As the Company is placed in the Middle Layer under the RBI's scale-based regulatory structure, the Company shall have a Board-approved policy on the grant of Loans/ICDs to its directors, senior officers, and relatives of directors, and to entities in which its directors or their relatives hold a major shareholding. Such Loans/ICDs shall be sanctioned only with the prior approval of the Board, and the policy shall specify a threshold beyond which every such Loan/ICD (including renewal or enhancement) shall be separately reported to the Board. The aggregate amount of Loans/ICDs so sanctioned shall be disclosed in the Company's Annual Financial Statement, as required under the applicable RBI Directions.

15. In line with the RBI's credit concentration norms applicable to the Company, the Sanctioning Authority shall ensure that the Company's aggregate exposure (fund-based Loans/ICDs taken together with any investment exposure) to a single borrower/party does not exceed 25% of the Company's Tier 1 Capital, and to a single group of connected borrowers/parties does not exceed 40% of the Company's Tier 1 Capital, in each case calculated as prescribed under the applicable RBI Directions. Any proposal that would breach, or already breaches, these limits shall be sanctioned only with the specific approval of the Board, along with reasons recorded in writing, and shall be reported to the Reserve Bank as required.

16. Any charges levied by the Company on a borrower for delay or default in servicing a Loan/ICD shall be treated strictly as 'penal charges' and not as 'penal interest'. Such penal charges shall not be capitalised or compounded (i.e., no further interest shall be computed on penal charges), shall be reasonable and proportionate to the default, shall not discriminate within a borrower category, and shall be clearly disclosed to the borrower in the loan application form/sanction letter, in line with the applicable RBI Directions on responsible lending conduct.

Review of the Policy

Pursuant to any subsequent amendments or any statutory modifications or re-enactments in the above stated guidelines/ norms/ clarifications or in any other applicable acts/ regulations, if there is any change in any of the parameter(s) framed by the Board, than the act/regulation will have overriding effect on the parameter (s). The policy may be subject to review and revision in accordance with the changes and directions as per RBI guidelines.

The Company shall review the above Policy in every two years based on its own experience, business need and RBI guidelines in this regard. Due to the Covid pandemic and disruptions, the entire policy could not be reviewed during 2020 and 2021. This has been reviewed and modified in the Board meeting dated 18/04/2023, further reviewed on 25/05/2026.