

## RELATED PARTY TRANSACTIONS POLICY

### 1. INTRODUCTION

This Policy has been framed by the Company and applies to all Related Party Transactions entered into with a Related Party effective March 9, 2017.

### 2. DEFINITIONS:

- (a) “**Act**” means Companies Act, 2013, including any statutory modification or re-enactment thereof;
- (b) “**Board**” means Board of Directors of the Company;
- (c) “**Related Party**” with reference to the company, means an entity where:
  - (i) Such entity is a Related Party as defined under section 2(76) of the Companies Act, 2013;  
or
  - (ii) Such entity is a related party under the applicable accounting standards.
- (d) “**Related Party Transaction**” means a transaction between the company and a Related Party which transaction is of the nature specified in sub-clause (a) to (g) of section 188(1) of the Companies Act, 2013;

### 3. TRANSACTIONS BETWEEN COMPANY & RELATED PARTIES:

Transactions between the Company and related parties shall be entered into in the manner that is compliant with the applicable provisions of the Companies Act, 2013 and other applicable laws.

### 4. INTERNAL PROCESSES IN REGARD TO RELATED PARTY TRANSACTIONS:

The Company shall with the approval of the Board of Directors, establish appropriate internal processes for the purpose of identification of Related Parties and any transactions with them, determination of whether the transaction(s) is in the ordinary course of business, whether the transaction(s) is on an arm’s length basis, monitoring the relevant matters to ensure adherence to this policy in entering into transactions with Related Parties.

### 5. AMENDMENT

The Board reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification shall be inconsistent with the applicable provisions of the Act or any law applicable to the Company for the time being in force.