

DEEVEE COMMERCIALS LIMITED
POLICY ON PRIVATE PLACEMENT ON NCDs

Policy on Private Placement of NCDs (maturity more than 1 year)

The Company as per RBI Master Direction of Non-Banking Financial Company - Systemically Important Non-Deposit taking Company (Reserve Bank) Directions, 2016 vide RBI/DNBR/2016-17/45 Master Direction DNBR.PD.008/03.10.119/2016-17 has put in place a Board approved policy for resource planning which, inter-alia, shall cover the planning horizon and the periodicity of private placement of NCDs (maturity more than 1 year).

The issues shall be governed by the following instructions:

- The minimum subscription per investor shall be 20,000 (Rupees Twenty thousand);
- 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;
- 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
- 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

Further, the Company will take due care while issuing debentures whose proceeds will be used only for deployment of funds on its own balance sheet and not to facilitate resource requests of group entities / parent company / associates

As per policy, the Company will not extend any loans against the security of its own debentures (issued either by way of private placement or public issue).

This policy will be amended from time to time as per master direction provided by RBI for NBFCs or any other manner where the Board of Directors thinks indispensable to modify/alter the same within the guidelines and rules framed by RBI.

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