AJIVIKA FINANCE LIMITED

RBI REGISTERED NBFC

RBI CERTIFICATE OF REGISTRATION NO. B-12.00476

POLICY ON GRANT OF LOANS TO DIRECTORS, SENIOR OFFICERS, AND THEIR RELATIVES

Issue and Effective Date: 1st October 2026

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1. PREFACE

The Board of Directors (the "Board") of Ajivika Finance Limited ("Company") adopted this policy with effect from 1st October 2026. The policy governs the grant of loans and advances by the Company to its directors, senior officers, their relatives, and to entities in which directors or their relatives are interested. This policy ensures compliance with applicable laws and regulations for such transactions.

2. OBJECTIVE & PURPOSE OF POLICY

This policy, titled "Policy on Grant of Loans to Directors, Senior Officers, and their Relatives and Entities in which Directors or their Relatives are Interested," is framed in line with the RBI Master Direction on Scale Based Regulation, 2023, Chapter IV Governance Guidelines. It establishes a review and approval mechanism for loans and advances to avoid potential or actual conflicts of interest.

3. DEFINITIONS

1. "Act": Refers to the Companies Act, 2013, including all associated rules, regulations, amendments, and reenactments.
2. "Audit Committee or Committee": A committee of the Board constituted in accordance with RBI Guidelines, Listing Regulations, and the Act.
3. "Board of Directors" or "Board": The governing body of the Company, constituted as required.
4. "Control": As defined under Clause (27) of Section 2 of the Companies Act, 2013.
5. "Director": A member of the Board of Directors.
6. "Loans and Advances": Does not include loans or advances against:

- Government securities
- Life insurance policies
- Fixed deposits
- Stocks and shares
- Housing loans, car advances, etc., granted to employees under any general scheme, with the Company's interest/lien appropriately marked and legally enforceable.

7. "Major Shareholder": A person holding 10% or more of the paid-up share capital or five crore rupees in paid-up shares, whichever is lower.

8. "Policy": This Policy on Grant of Loans to Directors, Senior Officers, and their Relatives or Entities where Directors or their Relatives have an interest.
9. "Relative": As defined under subsection (77) of Section 2 of the Companies Act, 2013.
10. "Senior Officer": As defined under Section 178 of the Companies Act, 2013.

4. LOANS AND ADVANCES TO DIRECTORS

Guiding Principles:

I. Unless sanctioned by the Board of Directors, the Company shall not grant loans and advances aggregating Rs. 100.00 Lacs to:

- Directors (including the Chairman/Managing Director) or their relatives.
- Any firm in which a Director or their relative holds a role as a partner, manager, employee, or guarantor.
- Any company in which a Director or their relative is a major shareholder, director, manager, employee, or guarantor.

Provisions:

- A Director or their relative is deemed interested in a subsidiary or holding company if they are a major shareholder or hold control.
- Directors with a direct or indirect interest in any proposal must disclose their interest to the Audit Committee and Board during discussions and recuse themselves from the meeting unless required for eliciting information. The interested Director shall not vote on such proposals.
- Credit facility proposals under Rs. 50.00 Lacs may be sanctioned by the Sanctioning Authority under delegated powers, but the matter must be reported to the Board.

5. LOANS AND ADVANCES TO SENIOR OFFICERS

Guiding Principles:

- Loans and advances sanctioned to Senior Officers must be reported to the Board of Directors.
- No Senior Officer or any committee with a Senior Officer as a member shall sanction credit facilities to their relatives. These facilities shall be sanctioned by the next higher Sanctioning Authority under delegated powers.

6. DISCLOSURE REQUIREMENTS

1. The Company must obtain a declaration from borrowers for loans aggregating Rs. 25 lacs and above, detailing the relationship of the borrower to the directors or senior officers of the Company.
2. The Company reserves the right to recall the loan if it becomes aware of false declarations from the borrower.
3. The aggregate amount of sanctioned loans and advances must be disclosed in the Annual Financial Statement, as per the template provided in RBI Guidelines.
4. The same norms apply to the awarding of contracts involving Directors and Senior Officers.

7. SCOPE LIMITATION

In the event of any conflict between this policy and the Companies Act, 2013 or any other statutory regulations, the provisions of the Companies Act, 2013 or statutory enactments shall prevail over this policy.

8. REVIEW AND AMENDMENTS

- The Board will oversee the implementation of this policy and review its effectiveness periodically.
- Amendments to the policy can be made by the Board in line with statutory enactments or amendments as required.

VERSION HISTORY

Version No.	Version Date	Type of Changes	Prepared & Verified By	Date of Approval
1.0	01-10-2026	Policy Formation	Kamal Kant Dang	01-10-2026