

SUBHKAM VENTURES (I) PRIVATE LIMITED

LOAN POLICY - DEMAND/CALL LOAN

Version	Approval	Version Description	Regulatory Reference
1.0	Board Meeting dated 16 th April, 2024	2024	Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023
2.0	Board Meeting dated 21 st April, 2025	2025	Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023

SUBHKAM VENTURES (I) PRIVATE LIMITED

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SUBHKAM VENTURES (I) PRIVATE LIMITED

LOAN POLICY - DEMAND/CALL LOAN

BACKGROUND

Subhkam Ventures (I) Pvt. Ltd. (**the “Company”**) is a Non- Banking Finance Company (Non Deposit Accepting Systemically Important NBFC) registered under the Section 45-IA of the Reserve Bank of India Act, 1934. Vide the notification no. DOR.CRE.REC.No.60/03.10.001/2021-22 issued by RBI with respect to Scale Based Regulation (SBR): A Revised Regulatory Framework for NBFCs, we have been classified as **“Middle layer NBFC”**. The primary business of the Company is to invest/trade in the Shares, Securities, bonds etc. to earn returns in the form of trading profits, capital gains and Dividend, and/or interest through Lending. In compliance with the Master Direction–Non-Banking Financial Company–Systematically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as well as in compliance with new regulations Policy on Demand/ Call Loans has been re-framed with Board approval.

CONDITIONS

Keeping the regulatory requirement in view, a policy on extending Demand/ Call loans per se is detailed out as under:

Based on abovementioned operational activities of the Company the Demand/ Call Loan policy features following guidelines:

1. All Loans shall be pre-approved by the persons authorized by the Board in this behalf.
2. Loans must be supported with the requisite loan request letter mentioning therein the terms & conditions of sanctioning the loan, applicable rate of interest and be supported with other requisite documents as per the Company’s Fair Practice Code Policy.
3. Interest on such loans, as stipulated shall be payable either at monthly or quarterly rest.
4. Demand/ Call loans can be availed in continuity over a period of time. The said period can be decided on the first date on which the loan is given and is subject to revision as per the requirement of the borrower and pre- approval from persons authorized by the Board in its meeting held for recommendation of revised Demand/ Call loan policy.
5. A cutoff date, i.e. a date within which the repayment of such loans may be Demanded/ Called upon must be decided on the first date on which the loan is given and is subject to revision as per the requirement of the borrower and pre- approval from persons authorized by the Board in this behalf. The sanctioning authority shall also record specific reasons in writing if no interest is stipulated or a moratorium is granted for any period over and above the actual sanctioned tenure of loan.
6. All Demand/Call loans must have a cutoff date, for review of performance of the loan, which shall not exceed six months from the date of sanction of loan.
7. Based upon its performance, the Demand or Call loans shall not be renewed unless the periodical review has shown satisfactory compliance with the terms of sanction.
8. In case of disputes the matter shall be escalated to the grievance redressal officer of the Company.
9. In case no Call/ Demand is made prior to the expiry of the stipulated period, then the loan shall be deemed to be Called/ Demanded on such expiry date and shall be repaid accordingly.

REVIEW

In case there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended at the next possible opportunity. However, the amended regulatory requirements will supersede the Policy till the time Policy is suitably amended.

Date: 21/04/2025

Place: Mumbai

