<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Particulars</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Introduction and Objective</td>
<td>2</td>
</tr>
<tr>
<td>2.</td>
<td>Compliance with Regulatory requirements</td>
<td>3</td>
</tr>
<tr>
<td>3.</td>
<td>Investment universe and holding period</td>
<td>4</td>
</tr>
<tr>
<td>4.</td>
<td>Classification of investments</td>
<td>5</td>
</tr>
<tr>
<td>5.</td>
<td>Transfer of Investments</td>
<td>6</td>
</tr>
<tr>
<td>6.</td>
<td>Depreciation and Appreciation</td>
<td>7</td>
</tr>
<tr>
<td>7.</td>
<td>Valuation</td>
<td>8-9</td>
</tr>
<tr>
<td>8.</td>
<td>Acquisition / disposal of investments</td>
<td>10</td>
</tr>
</tbody>
</table>
INTRODUCTION AND OBJECTIVE

In terms of Non-Banking Financial Companies Prudential Norms (Reserve Bank) Directions, 1998, the Board of Directors of Reliance Strategic Investments Limited (herein after referred to as “the Company” or “RSIL”) had approved the Investment Policy at its meeting held on December 2, 2003 and reviewed the same at its meeting held on October 26, 2012, October 13, 2015 and October 13, 2020.

Further, the Investment Policy has been revised by the Board at its meeting held on July 19, 2022.

The Investment Policy lays down the broad guidelines for defining investment goals, an investment universe, portfolio diversification, making investment decisions, criteria for classifying investments, holding period for investments, trading in investments and evaluating performance of the investment portfolio.

The meeting of the long-term investment goals of the Company is primarily dependent on a number of factors which not only include the safety of the investment, capital appreciation and reasonable rate of return, but also inflation and taxes.

The purpose of the Company to hold the investments is to get market returns out of the investments which can be in any of the following manner:

1. Dividend,
2. Interest,
3. Capital appreciation or
4. Other benefits.
COMPLIANCE WITH REGULATORY REQUIREMENTS

1. In its investment operations, the Company will strictly adhere to various guidelines as may be stipulated by the Reserve Bank of India (“RBI”) from time to time. These guidelines will include:
   - Non-Banking Financial Companies (Non-Deposit Accepting or Holding) Companies Prudential Norms (Reserve Bank) Directions, 2007 as amended up to date.
   - Guidelines for investments in unlisted and unrated securities and any other applicable guidelines as may be issued from time to time.

2. 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, then the act / regulation will have overriding effect on the parameter(s).

3. The Company shall take all investment decisions only at the meetings of its Board of Directors. The Board of Directors, by way of a resolution, may delegate the said power to Investment and Lending committee, the Managing Director, any Director, the Company Secretary or any other duly authorized officials (hereinafter collectively referred to as the “delegate”) of the Company. The said resolution should specify the total amount up to which the funds may be invested, the nature and holding period of the investments which may be made by the delegate. The decisions taken by the authorised persons along with the rationale for the investments would have to be placed before the Board of Directors of the Company at periodic intervals for its noting / ratification.
INVESTMENT UNIVERSE AND HOLDING PERIOD

RSIL may invest (at the time of investment) in a broad range of investment grade securities as may be permissible under regulations including Government securities in any form, quoted or unquoted (listed/ unlisted) stocks, shares including preference shares, bonds, convertible/ non-convertible debentures, securitized assets, mutual fund units, commercial paper, certificate of deposits, inter-corporate deposit and bank deposits etc. Debt securities will have to be rated by accredited credit rating agencies in the applicable regulatory jurisdiction. RSIL may invest in unrated securities and perpetual debt instruments with the approval of the Board or Investment and Lending Committee, the Managing Director, any Director, the Company Secretary or any other duly authorized officials. All investment decisions will be backed by compressively documented investment rationale with supporting valuation, rating and equity research reports.

While constructing the investment portfolio, RSIL will hold an appropriately diversified portfolio and operate within the risk parameters established under its Risk Management Policy. RSIL may hold investments over the long term or the short term depending on objective for making the specific investment, business requirements, market conditions and opportunities etc. and accordingly classify its investments at the time of making the investment. RSIL shall evaluate the performance of its portfolio periodically and submit reviews to the Board.
CLASSIFICATION OF INVESTMENTS

The Investments, that the Company will hold, will be treated as the assets of the Company held with the motive of earning income by way of dividend, interest, capital appreciation or for other benefits. The investments of the Company will be classified into the following two categories:

| 1. Current Investments including Stock in trade | : The investments made by the Company which by its very nature are readily realisable and are intended to be held for not more than one year from the date on which such investment is made. |
| 2. Long term Investments | : Any other investment other than the aforesaid current investments will be construed as long term investment |

The Company being a subsidiary of Reliance Industries Limited may make long term strategic Investments (and not for trading purpose) in securities of bodies corporate engaged in business operations which would be strategically synergistic with the Company’s own business activities or the business activities of its Holding Company(ies), if any or the business activities of its Subsidiary Company(ies), if any.

The Company may also make investments in listed & Unlisted securities of other than Group Company both short term / long term for earning income by way of dividend, interest, capital appreciation or other benefits also.

All listed / Unlisted Investments will be monitored by the Principal Officer under the supervision of the Board of Directors of the Company.
TRANSFER OF INVESTMENTS

The Company shall not make any inter class transfer on ad hoc basis. If the inter class transfer is warranted then it shall be effected only at the beginning of each half year, on April 1 or October 1, with the approval of the Board.

The investments shall be transferred scrip-wise, from current investments to long term investments, at cost or fair value\(^1\), whichever is lower.

The investments shall be transferred scrip-wise, from long term investments to current investments, at cost or carrying amount\(^2\), whichever is lower.

\(^1\) Fair value is the amount for which an asset could be exchanged between a knowledgeable, willing buyer and a knowledgeable, willing seller in an arm’s length transaction. Under appropriate circumstances, market value or net realisable value provides an evidence of fair value.

\(^2\) The carrying amount for current investments is the lower of cost and fair value.
DEPRECIATION AND APPRECIATION

The depreciation, if any, in each scrip shall be fully provided for and appreciation, if any, shall be completely ignored.

The depreciation in one scrip shall not be set off against appreciation in another scrip, at the time of inter class transfer, even in respect of the scrips of the same category.
VALUATION

A. GENERAL

1. The cost of the investment(s) will include the acquisition charges such as brokerage, fees and duties.

2. If the Company acquires (fully or partly) any investment, by issue of shares or other securities, the acquisition cost will be the fair value of the securities issued.

3. If the Company acquires any investment in exchange, or part exchange, for another asset, the acquisition cost of the investment will be determined by reference to the fair value of the asset.

4. If the Company subscribes for any right shares offered, the cost of the right shares is added to the carrying amount of the original holding. If rights are not subscribed for but are sold in the market, the sale proceeds are taken to the profit and loss statement.

5. If the Company acquires investments on cum-right basis and the market value of investments immediately after their becoming ex-right is lower than the cost for which they were acquired, it may be appropriate to apply the sale proceeds of rights to reduce the carrying amount of such investments to the market value.

6. The Company may treat the interest and dividends in connection with the investments in any of the following ways:
   
   (i) As income, being the return on the investment.
   (ii) Recovery of cost.

   Where income receivable on investments has been accrued and has not been received for a period of 12 months beyond the due date, provision shall be made by debit to the revenue account for the income so accrued and no further accrual of income should be made in respect of such investment.

B. QUOTED INVESTMENTS

The quoted investments will be grouped in the following headings for the purpose of the valuation:

(a) Equity Shares
(b) Preference Shares
(c) Debentures and bonds
(d) Government securities including treasury bills
(e) Units of mutual funds and
(f) others
The quoted investments for each category shall be valued at cost or market value, whichever is lower. However, if the decline in the market value is of a temporary nature, the same shall be ignored. The investment in each category shall be considered scrip-wise and the cost and market value aggregated for all investments in each category. In the aggregate market value for the category is less than the aggregate cost for that category, the net depreciation shall be provided for or charged to the profit and loss account. If the aggregate market value for the category exceeds the aggregate cost for the category, the net appreciation shall be ignored. Depreciation in one category of investments shall not be set off against appreciation in another category.

C. UNQUOTED INVESTMENTS

1. The unquoted equity shares in the nature of current investments shall be valued at cost or break-up value, whichever is lower. However, if required, the Company may substitute fair value for the break up value of the shares.

2. The unquoted preference shares in the nature of current investments shall be valued at cost or face value, whichever is lower.

3. The investment in unquoted Government securities or Government guaranteed bonds shall be valued at carrying cost.

4. Unquoted investments in the units of mutual funds in the nature of current investments shall be valued at the net asset value declared by the mutual fund in respect of each particular scheme.

5. Long-term investments are usually carried at cost. However, when there is a decline, other than temporary, in the value of a long term investment, the carrying amount is reduced to recognise the decline. The said decline shall be charged to the profit and loss statement. The reduction in carrying amount is reversed when there is a rise in the value of the investment, or if the reasons for the reduction no longer exist.
ACQUISITION / DISPOSAL OF INVESTMENTS

Transactions for purchase or sale of investments shall be recognised as of the trade date and not as of the settlement date, so that the effect of all investments traded during a financial year are recorded and reflected in the financial statements for that year. Where investment transactions take place outside the stock market, for example, acquisitions through private placement or purchases or sales through private treaty, the transaction shall be recorded, in the event of a purchase, as of the date on which the scheme obtains an enforceable obligation to pay the price or, in the event of a sale, when the scheme obtains an enforceable right to collect the proceeds of sale or an enforceable obligation to deliver the instruments sold.

Considering that Capital market is influenced by various factors viz, political, economics, natural calamities inland as well as global apart from financial strengths of individual companies, the Company would need to focus on risk identification, risk assessment, measurement, risk management, risk tolerance limits and risk mitigation plan. For this purpose, the Company shall take the following steps to mitigate the risks and minimize its market losses:

(i) It would have a target price for booking profit or losses and once the target reaches, the Company shall exit the concerned scrip.
(ii) In case of MTM losses of beyond 20% in any particular scrip, the Company would identify the reasons and consider if the scrip should be exited;
(iii) If the Company decides that the decline is temporary and there are foreseeable opportunities for appreciation, it would update the Board / Investment and Lending Committee ("ILC") about its views to enable Board / ILC to guide the management;
(iv) In case, the MTM losses widen to 30%, the Company should consider exit from the particular scrip or should prepare a reasoned note and seek scrip wise approval of the Board / ILC for continuance to hold such investments.

On disposal of an investment, the difference between the carrying amount and the disposal proceeds, net of expenses, is recognised in the statement of profit and loss.

When disposing of a part of the holding of an individual investment, the carrying amount to be allocated to that part is to be determined on the basis of the average carrying amount of the total holding of the investment.

(This Policy was approved by the Board of Directors at its meeting held on December 2, 2003)

(This Policy was revised by the Board of Directors at its meeting held on July 19, 2022 to be effective from July 19, 2022)