

Nalwa Sons Investments Limited

CIN: L65993DL1970PLC146414

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BUSINESS CONTINUITY POLICY

- 1) This policy may be known as “NSIL – Business Continuity Policy” hereinafter referred to as the “Business Continuity Policy”.
- 2) This Business Continuity Policy has been made pursuant to Master Direction – Reserve Bank of India (Non-Banking Financial Company –Scale Based Regulation) Directions, 2023 as amended from time to time.
- 3) The Board of Directors has approved and adopted this ‘Business Continuity Policy’ on 30th day of November, 2023.

4) **Company’s Profile**

Nalwa Sons Investments Limited (NSIL) is a Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India (RBI). In accordance with the Master Direction- Non-Banking Financial Company – Scale Based Regulations - (Reserve Bank) Directions, 2023 (hereinafter referred to as “the RBI Directions”) issued by the RBI, the Board of Directors of an applicable NBFC is required to frame and approve a Business Continuity Policy.

5) **Objectives**

The policy has been developed with an objective:

- To determine as how the institution will manage and control identified risks
- To Allocate knowledgeable personnel and sufficient financial resources to implement the Business Continuity Policy(BCP)
- For the top management to annually review the adequacy of the institution's business recovery, contingency plans and the test results and put up the same to the Board.
- For the top management to evaluate the adequacy of contingency planning and their periodic testing by service providers whenever critical operations are outsourced.

6) **Definitions**

For the purpose of this Investment Policy –

- a) “Act” means the Reserve Bank of India Act, 1934;
- b) “Board of Directors” means the Board of Directors of Nalwa Sons Investments Limited.
- c) “Body corporate” means a body corporate as defined under Section 2 of the Companies Act, 2013;
- d) “Company” or “NSIL” means Nalwa Sons Investments Limited;
- e) “Companies Act” means the Companies Act, 2013 or any statutory modifications or re-enactment thereof for the time being in force.

Other terms not defined hereinabove shall have same meaning as defined in “Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023” and as amended from time to time.

7) **Information and Security and Cyber Security:**

Access to the NSIL’s electronic information, information systems, and associated facilities is a

privilege that may be subject to monitoring and withdrawal without prior notification. All access is governed by legal regulations and policies, encompassing the specific requirements detailed in this policy among others.

Individuals or entities granted access to the NSIL's electronic information and information systems bear full accountability for all activities linked to their user credentials. They hold the responsibility to safeguard the confidentiality, integrity, and availability of information handled, processed, transmitted, stored, or managed by NSIL, regardless of the medium through which the information is maintained.

Further the Company shall formulate a Maker-checker concept to reduce the risk of error and misuse and to ensure reliability of data/information

A Digital signature certificate authenticates entity's identity electronically. NSIL protects the authenticity and integrity of important electronic documents and also for high value fund transfer.

8) Business Continuity Framework:

NSIL mandates its service providers to develop and implement a robust framework for documenting, maintaining, and regularly testing business continuity and recovery procedures. Ensuring adherence to these measures.

To mitigate the risk of unforeseen termination of outsourcing agreements or the liquidation of service providers, NSIL maintains an appropriate level of control over its outsourcing arrangements including containing a clear exit strategy with regard to outsourced IT activities/ IT enabled services, while ensuring business continuity during and after exit. This control includes the right to intervene with suitable measures, enabling the continuation of its business operations without incurring excessive expenses or causing disruptions to NSIL's services provided to its customers including exit of any third-party service provider.

9) Disaster Recovery & Cyber Resilience

In the event of a disaster affecting NSIL's data services/ cloud services or failure at the Cloud Service Provider's end, NSIL shall create backing up of data so it can continue its critical operations with minimal disruption of services while ensuring integrity and security.

10) Regulatory Reporting:

NSIL is subjected to regulation by the Reserve Bank of India (RBI). As per regulatory requirement, the NBFC reports instances of major failures faced by NSIL's customer segment/ services impacted due to failures and corrective steps taken to avoid such failures in future.

11) Back-up of Data with Periodic Testing:

Backing up data involves creating copies of important files or information to ensure its availability and integrity in case of data loss, corruption, accidental deletion, or system failures. These backups are essential for restoring the data to its original state or a previous version, thereby minimizing disruptions and potential losses.

12) Updates and Review:

NSIL shall update its Business Continuity Policy whenever there is a material change to its operations, structure, business or location. In addition, the Business Continuity Policy of various

functions shall be reviewed as and when required to incorporate changes in its operations, structure, business, or locations.

13) Exceptions to the Policy

Any exception to this Policy shall require prior approval of the Board of Directors of the Company.