

INFORMATION TECHNOLOGY POLICY

1. BACKGROUND:

The Reserve Bank of India ('RBI') vide its Circular RBI/DNBS/2016-17/53 and Master Direction DNBS.PPD.No.04/66.15.001/2016-17 dated 08th June, 2017 for Non-Banking Financial Companies – IT/IS/BCP Policy, 2017 dated 08th June, 2017 requires NBFCs to adopt Policy with the approval of Board.

2. APPLICABILITY:

As per the circular and master direction NBFC with asset size below Rs. 500 Crore shall adopt IT Policy as per **SECTION B** given in Master direction.

3. PURPOSE/OBJECTIVE:

The objective and purpose of this policy is:

- Developing IT System for maintaining the database.
- To frame IT standards and measures for company in order to comply with above said RBI Master Direction.
- To ensure that each person to be appointed or already appointed understands, the IT policy and their obligation to meet its requirement.

4. REQUIREMENTS OF THE POLICY:

1. Recommended to the Board for approval, Basic security aspects such as physical/logical access controls and well defined password policy;
2. Identify and secure a well defined user role;
3. A maker checker concept to reduce the risk of error and misuse and to ensure reliability of data/information;
4. Information Security and Cyber Security;
5. Requirements as regards Mobile Financial Services, Social Media and Digital Signature Certificates;
6. System generated reports for Top Management summarizing financial position including operating and non-operating revenues and expenses, cost benefit analysis of segments/verticals, cost of funds, etc.;

7. Adequacy to file regulatory returns to RBI (COSMOS Returns);
8. A BCP policy duly approved by the Board ensuring regular oversight of the Board by way of periodic reports (at least once every year);
9. Arrangement for backup of data with periodic testing.

5. REVIEW:

The Committee shall, as and when required, assess the adequacy of this Policy and make any necessary amendments to ensure it remains consistent with the Board's objectives, current law and best practices.

For, ANJANI FINANCE LIMITED

K Jain
(KALPANA JAIN)
Director
DIN:02665393

