



TERMINALS

Allcargo Terminals Limited

CIN: L60300MH2019PLC320697

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POLICY FOR DETERMINING INVESTMENT

A. OBJECTIVE: This Investment policy is for the below stated objectives of **Allcargo Terminals Limited (ATL)** funds: -

1. To ensure optimum utilization of the Company's available cash resources and invest in various Investment avenues.
2. To ensure Capital protection for the Company.
3. To earn optimum income by selecting appropriate basket of investment products.

B. INVESTIBLE SURPLUS: This means any funds over and above the minimum business requirement and available for treasury for tenure of 2 days and above. Corporate Finance in consultation with respective finance controllers will decide such excess funds and advice treasury division for deployment on daily basis.

C. Do's: The following will have to be followed: -

1. To monitor available surplus cash funds on a regular basis.
2. To invest this surplus from time to time in consultation with the Company's investment advisors / brokers **satisfying broadly following two conditions:**

- **Scheme of investment will be rated within top 10 schemes on the date of investment.**
- **Surplus funds will be invested in the schemes which are having corpus of more than Rs 1,000 crores on the date of investment.**

**** "Notwithstanding as mentioned above, henceforth, all investments to be made/reviewed after considering market outlook on the date of investment, quality of the product inbuilt portfolio and in any specific structured product in line with then prevailing market conditions. This means investments may be made not necessarily in top 10 schemes on the date of investment due to prevailing market conditions."***

3. To monitor the investments on a **fortnightly** basis, taking into account the current investment market conditions, Interest rate movement, debt market scenarios & Investment Avenues available and taking prudent decisions for continuing with the existing funds / structured Notes / schemes or switching over to other funds / structured notes / schemes.
4. To monitor on a **fortnightly** basis the top **10** performers in every **debt and money market category such as liquid, ultra short term, duration & income products, GILT products, overnight funds etc.** Such monitoring should be carried out for evaluating returns over two to four weeks.
5. To review this broad policy with the Chairman of the Executive Committee on **quarterly** basis.
6. All investments should be made in "Growth" schemes only till the Time Company is covered under "MAT"

D. Don'ts: The following will not be allowed and followed: -

1. At any given date, investment in one single Asset Management company (AMC) should not be more than 25% of the total investment in Mutual Funds, unless the scheme is giving consistent high returns and is one of the top 5 performing schemes. However irrespective of what is mentioned here, investment in a single AMC should not exceed Rs.30 Crores.
2. Funds should not be invested in any scheme of Mutual Funds / NBFCs / Investment Banks / Structured Notes which has Equity Exposure.

E. Criteria for Investment in Inter Corporate Deposit (ICD)

Company, normally will not invest in ICD's however with approval of Executive committee, it may invest in ICD's provided the investee/borrower meets the following criteria:

- ICD should be given only to the Company which has been rated by any of the rating agencies and rating assigned is not less than AA. However, Chairman of the Executive committee has the discretionary rights to approve ICDs in the companies having lower or no ratings based on the track records of the companies and their promoters.
- Investee Company should have positive revenue from operations in last two years.
- Net worth of the investee Company should be positive.
- Documentation required: Board / Shareholders resolution of Investee Company for borrowing, Demand Promissory Note, Last Audited Financial Statements, certificate by the Company Secretary or Statutory Auditor / Company Secretary in whole time practice of the Investee company certifying that the borrowing(s) are within the limits approved by its Shareholders under the appropriate provisions of the Companies Act, 2013, as amended, Post Dated Cheques for repayment of Principal & Interest, Loan / ICD Agreement, Memorandum and Articles of Association and such other documents as the Chairman of the Executive Committee and Managing Director or Chief Financial Officer of the Company may deem it necessary.
- At any point of time total amount advanced by way of ICD should not be more than 25% of the investible surplus or Rs.50 crores, whichever is lower.

F. General Procedures: The following procedural methods should be adhered to:-

1. All investment / redemption decisions including selection of funds / structured notes / schemes to be taken in consultation with the authorized signatories.
2. Any switch-over / redemption shall be made by an e-mail communication to investment advisors. However, signed approval of the authorized signatories shall be obtained for any switch-over/redemption through execution of necessary documents.
3. Account statements from all Mutual Funds to be properly filed, scheme-wise and should be easily accessible.
4. **On a monthly basis, In addition to consolidated MIS, a detailed investment performance statement should be prepared containing specific details such as No. of units, Investment value, current NAV, current value, returns and income accrued. Detailed investment performance statement will have to be submitted to Managing Director, Chief Financial Officer and Chairman of the Executive Committee.**
5. **These reports should be submitted, preferably, by the first week of following month.**

Chairman of the Executive Committee has the discretionary rights to waive off any of the above requirements / guideline/s in consultation with Managing Director and Chief Financial Officer.

Authorized Signatories of the Company as may be decided by the Board and any Committee thereof, are severally authorized to sign, execute and deliver all documents, deeds, agreements, writings, cheques and to give instructions relating to the investments of the Company from time to time.

Version	Effective Date	Description of Changes
1.0	April 01, 2023	Adoption at Board Meeting held on July 05, 2023