

DEVINSU TRADING LIMITED

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POLICY OF FAMALIARIZATION PROGRAMME FOR INDEPENDENT DIRECTORS

Familiarization Program for Independent Directors: The Company has taken up this initiative pursuant to Regulation 25 and Regulation 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”).

PURPOSE & OBJECTIVES

The Company has formulated Familiarization Programme for Independent Directors with an aim to make the Independent Directors aware about their roles, responsibilities and liabilities as per Companies Act, 2013 and other applicable laws, rules and regulations, as amended from time to time and to get better understanding about the Company, nature of industry its operates and environment in which it functions, business model, long term/short term/strategic plans, important changes in regulatory framework etc. The Directors are also informed about the important policies of the Company including the Code of Conduct for the Board Members and Senior Management Personnel and the Code of Conduct to regulate, monitor and report trading by Insiders etc.

The Company shall through its Executive Directors/ Senior Management Personnel conduct programs/ presentations periodically to familiarize Independent Directors about business strategies, management structure, HR Policy, risk management framework, operations of subsidiaries, and policies applicable as per SEBI Listing Regulations, RBI Regulations, Master Directions, etc. In case, the Independent Directors are interested in meeting any specific department or function or to get any further detail, the same is also arranged.

INDUCTION PROCESS

On selection and appointment of the candidate as an “Independent Director”, an induction manual containing, inter-alia, the following documents are sent along with a welcome note.

- Corporate Presentation
- Annual Reports
- Code for Independent Directors (Schedule IV of the Companies Act, 2013, as amended from time to time)
- Board Evaluation Policy
- Policies applicable as per RBI Guidelines
- URL of website of the Company for reference purpose

As a part of Induction Program, the Independent Director are invited by Whole Time Director. Presentations by functional heads are made to apprise the Director about the Company and its peers, overview of operations, role of each function in the organization, etc.

OTHER INITIATIVES

- A Director is briefed about his/her duties, roles and responsibilities as an Independent Director.
- The Company keeps on familiarizing the Directors on quarterly basis at the Board and Committee Meetings by making presentations on operations of the Company, market share, financial parameters, working capital management, changes in senior management, major litigations, compliances, management structure, HR Policy, risk management framework, operations of subsidiaries, policies applicable as per RBI Guidelines etc.
- Various functional heads, business executives and other special invitees like auditors etc. are invited to the Board & Committee Meetings for one-to-one discussion with the Members and address the specific queries/ issues for better understanding of the business and operations of the Company.

- The Board of Directors is given complete access to the information within the Company.
- A copy of all the applicable codes and policies as formulated and adopted by the Company are handed over to the newly appointed Director.
- The Board Members are updated about all the statutory and regulatory amendments from time to time.
