

Investment Policy Document

Raghav Productivity Enhancers Limited (RPEL)

1. Scope

This policy governs the investment of all surplus funds of Raghav Productivity Enhancers Limited (along with its wholly owned subsidiary, Raghav Productivity Solutions Private Limited, referred to as "RPEL"). It excludes statutory employee benefit funds and strategic investments in subsidiaries, JVs, etc. and applies solely to discretionary funds not required for immediate operations.

2. Investment Objectives

- a.** Return on Investment (Yield): Aim to achieve competitive returns within the constraints of safety and liquidity. Premature liquidation may be considered for:
 - i.** Avoiding losses from deteriorating credit.
 - ii.** Meeting cash flow requirements.
- b.** Safety: Preservation of principal is the foremost objective. Investments must be made prudently to minimize credit and interest rate risks.
- c.** Risk Mitigation:
 - i.** Engage only with pre-qualified, financially sound institutions
 - ii.** Diversify investments to avoid over-concentration in any one issuer
- d.** Liquidity: Ensure availability of cash to meet foreseeable and unforeseen business needs by investing in instruments with active secondary markets or short maturities.

3. Standards of Care

- a.** Prudence: Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of capital as well as the probable income to be derived. All due diligence undertaken while evaluating an investment proposal in equity/equity linked or corporate bond instruments shall be documented.
- b.** Ethics & Conflicts of Interest: Employees involved in investments must avoid conflicts of interest and disclose any financial interests in institutions they deal with.
- c.** Delegation of Authority: The Managing Director and Chairman to delegate responsibilities to designated officers under a system of internal controls.

4. Eligible Investments

Investments shall be limited to the following instruments:

Instrument	Criteria
Fixed Deposits (FDs)	Only with RBI-licensed banks, suitably diversified across 2 or more banks.
Commercial Paper (CP)	Max 180 days, rated A1+ by a recognized agency.
Bonds (Govt/Corp)	Government-issued bills or high investment-grade corporate bonds (Rated A or above) only.
Mutual Funds (Debt/Hybrid)	SEBI-registered, aligned with risk profile; liquid schemes preferred.
Public Equity/Mutual Funds (Equity)	Not more than 20% of total investment, in consultation with SEBI registered Investment Advisor or any other subject matter expert. All such investments shall be subject to a cut-loss limit of 10%.

5. Investment Restrictions

To provide for the safety and liquidity of RPEL's surplus funds, the investment portfolio will be subject to the following restriction:

- No use of borrowed funds for investment (no leverage).
- Derivative instruments (futures, options, swaps, etc.) are prohibited.
- Crypto Currencies are prohibited.
- No short selling.
- A single investment in equity/equity linked or corporate bond instrument shall not account for more than 10% of RPEL's most recently reported total Networth investment (except with Board approval).

6. Investment Classification

- Short-Term Investments: ≤ 12 months.
- Medium-Term Investments: >12 months ≤ 36 months.
- Long-Term Investments: > 36 months.

7. Authority for Investments

- Short-Term and Medium-Term Investments shall require prior approval of the Managing Director (MD).
- All long-term investments require prior approval of the Board of Directors.

8. Valuation Principles

Investments shall be valued basis the following table:

Instrument	Criteria
Quoted Equity	Market value
Unquoted Equity	Cost or NAV
Bonds (Govt/Corp)	Amortized cost or current valuation
Mutual Funds (Debt/Hybrid/Equity)	Latest NAV published by fund house

9. Performance Review & Reporting

- a. Portfolio performance and holdings will be reported annually to the Board.
- b. Deviations or losses shall be reported in the consequent board meeting with justifications.

10. Record Keeping & Safekeeping

- a. Maintain detailed records of all transactions.
- b. Secure physical and electronic records.
- c. Ensure timely credit of dematerialized securities and valuation updates.

11. Policy Governance

- a. Exceptions: Any investments outside this policy will require ratification by the board in the subsequent board meeting.
- b. Review: Annual review by the board of directors for any amendments.

Adopted by the Board of Directors on [13/01/2026]

For and on behalf of Raghav Productivity Enhancers Limited

Sd/-

**Rajesh Kabra
Managing Director
DIN: 00935200**