

RELATED PARTY TRANSACTION POLICY

1. Preamble

The Board of Directors (the “Board”) of Supreme Holdings & Hospitality (India) Ltd. (the “Company”) has adopted the following policy and procedures with regard to Related Party Transactions as defined below. The Board of Directors of the company will review and may amend this policy from time to time.

This policy is to regulate transactions between the Company and its Related Parties based on the applicable laws and regulations applicable on the Company.

2. Purpose

This policy is framed as per requirement of Clause 49 of the Listing Agreement entered by the Company with the Stock Exchange(s) and intended to ensure the proper approval and reporting of transactions between the company and its Related Parties. The Company is required to disclose each year in the Financial Statements certain transactions between the Company and Related Parties as well as policies concerning transactions with Related Parties.

3. Materiality of Related Party Transactions

Contracts/ arrangements with a related party shall be considered as “material related party contracts / arrangements if the transactions during a financial year under such contracts/ arrangements exceed the threshold prescribed by SEBI circular CIR/CFD/POLICY CELL/2/2014 dated April 17, 2014 or any amendment thereof.

4. Policy

- 4.1 All related party contracts / arrangements shall be entered on arm’s length basis.
- 4.2 In exceptional circumstances, where permitted by law, related party contracts / arrangements may deviate from the principle of arm’s length, after approval from Adult Committee.
- 4.3 All related party contracts/ arrangements shall comply with the Companies Act, 2013.
- 4.4 All related party contracts / arrangements shall comply with Listing Agreement.
- 4.5 All related party contracts/ arrangements shall comply with Accounting Standards.
- 4.6 Approval of Audit Committee shall be taken for related party contracts / arrangements as required under the Companies Act and Listing Agreement.

5. Related party Transactions not approved under this Policy

In the event the Company becomes aware of a Related Party Transactions with a Related Party that has not been approved under this policy prior to its consummation, the matter shall be reviewed by the Audit Committee. The Audit Committee shall consider all of the relevant facts and circumstances regarding the Related Party Transactions, and shall evaluate all options available to the Company, including ratification, revision or termination of the Related Party Transaction. The Audit committee shall also examine the facts and circumstances pertaining to the failure of reporting such Related Party Transaction to the Audit Committee under this policy, and shall take any such action it deems appropriate.

In any case, where the Committee determines not to ratify a Related Party Transaction that has been commenced without approval, the Committee, as appropriate, may direct additional actions including, but not limited to, immediate discontinuation or rescission of the transaction. In connection with any review of a Related Party Transaction, the Committee has authority to modify or waive any procedural requirements of this Policy.