

JALAN CHEMICAL INDUSTRIES PVT LTD

POLICY ON FIDELITY AND SECRECY OF CREDIT INFORMATION

DATA

(Formulated in terms of Section 29 of the Credit Information Companies (Regulation) Act, 2005; approved and adopted by the Board of Directors at their meeting held on 31.03.2024)

Our Company, M/s. Jalan Chemical Industries Pvt Ltd, is an Investment and Credit Company “NBFC-ICC”, as defined in Para 5.1.19 of Chapter II of the Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 (“the Directions”) issued by the Reserve Bank of India on 19th October, 2023. The Company is engaged in the business of providing finance by way of making loans and trading/investments in securities.

Section 29 of Credit Information Companies (Regulation) Act, 2005 reads as follows:

Obligations as to fidelity and secrecy:-

- (1) Every credit information company shall observe, except as otherwise required by law, the practices and usages customary among credit information companies and it shall not divulge any information relating to, or to the affairs of, its members or specified users.
- (2) Every chairperson, director, member, auditor, adviser, officer or other employee of a credit information company shall, before entering upon his duties, make a declaration of fidelity and secrecy in the form, as may be prescribed in this regard.

Explanation.—For the purposes of this section and Section 30, the terms “practices and usages customary” means such practices and usages which, are generally followed by credit information companies or may develop in due course in relation to their functions, in pursuance of the provisions of this Act, rules and regulations made and directions issued thereunder from time to time in pursuance thereof.

OBJECTIVE

The Credit Information Companies (Regulation) Act, 2005 received the assent of the President of India on June 23, 2005 to become a law. It is an Act to provide for



regulation of credit information companies and to facilitate efficient distribution of credit and for matters connected therewith or incidental thereto.

In exercise of the powers conferred by sub-section (2) of section 37 of the Credit Information Companies (Regulation) Act, 2005, the Reserve Bank of India, has framed the Credit Information Companies Rules, 2006 ("the Rules")

As per Section 29 of the Act, every Credit Institution, in possession or control of data, information and credit information shall adopt all reasonable procedure to ensure that their managers, officers, employees are obliged to fidelity and secrecy in respect of credit information under their control or to which they have access and shall formulate a policy in this respect, duly approved by its Board of Directors specifying therein the steps to be taken by them to ensure compliance of the fidelity and secrecy obligation.

Accordingly, Jalan Chemical Industries Pvt Ltd (the "Company") has adopted the Policy and Procedure (hereinafter referred to as 'the Policy') to be followed while conducting their operations, in due compliance with the Rules.

PREAMBLE

- a) The Policy should be complied with both in letter and spirit.
- b) No dispensation would be granted to this Policy.
- c) Any lapse or non-compliance to the Policy would be viewed seriously and reported to the Management for suitable disciplinary action.
- d) Action of Company shall in no way preclude Reserve Bank of India from taking any action in case of violation of the Credit Information Companies (Regulation) Act, 2005.
- e) The Policy is subject to review from time to time to comply with the regulatory requirements and industry standards.

SCOPE OF THE POLICY

The Policy shall apply to all such relevant data in respect of its borrower or client, as the Company may deem necessary and appropriate for collecting, processing, security, protecting, transmitting and maintaining an accurate and complete data, and credit information in respect of such borrower or client.



DEFINITIONS

- a) "the Act" means The Credit Information Companies (Regulation) Act, 2005 as amended from time to time
- b) "the Rules" means The Credit Information Companies Rules, 2006
- c) "Credit Information Company" means such Credit Information Company as formed and registered under the Companies Act, 1956 and which has been granted a Certificate of Registration u/s 5(2) of the Credit Information Companies (Regulations) Act, 2005.
- d) "Company" means Jalan Chemical Industries Pvt Ltd or "JCIPL", or "the Company" for the purposes of this Policy.
- e) "Regulations" mean the Credit Information Companies Regulations, 2006.
- f) "RBI" means the Reserve Bank of India.
- g) "Borrower" means any person who has been granted loan or any other credit facility by JCIPL and includes a client of a credit institution.
- h) "credit information" means any information relating to—
 - (i) the amounts and the nature of loans or advances, amounts outstanding under credit cards and other credit facilities granted or to be granted, by JCIPL to any borrower;
 - (ii) the nature of security taken or proposed to be taken by JCIPL from any borrower for credit facilities granted or proposed to be granted to him;
 - (iii) the guarantee furnished or any other non-fund based facility granted or proposed to be granted by JCIPL for any of its borrowers;
 - (iv) the creditworthiness of any borrower of JCIPL;
 - (v) any other matter which the Reserve Bank may, consider necessary for inclusion in the credit information to be collected and maintained by credit information companies, and, specify, by notification, in this behalf;



CONFIDENTIALITY OF DATA, INFORMATION OR CREDIT INFORMATION

Any officer, employees, authorized personnel, agents, contractors and other persons, assessing or in possession of any data, information or credit information of the company or relating to any person(s) dealing with the Company, shall maintain full confidentiality of such data/information/credit information and shall not disclose or let the same be disclosed to any person, save and except, when the same is legally required to be disclosed and after seeking due permission of the Principal Officer.

OBLIGATIONS AS TO FIDELITY AND SECRECY

The Company shall not divulge any information relating to, or to the affairs of, its clients except in circumstances in which it is, in accordance with the law or practice and usage, customary, necessary or appropriate for the public financial institution to divulge such information.

The Company shall further adopt such procedures and measures in relation to its daily operations as may be necessary to safeguard and protect the confidentiality and integrity of the data, information and the credit information obtained and maintained, against any unauthorised access or misuse of the same including the following safeguards, that: -

- 1) The employees, authorized personnel, agents, contractors and other persons who deal with or have right to access data, information and credit information shall comply with confidentiality obligation and sign covenants to ensure the same.
- 2) Every chairperson, director, auditor, advisor, officer or other employee of a credit information company, before entering upon his duties makes a declaration in Form III for complying with such fidelity and secrecy obligation.
- 3) Data stored in computers or any other storage media shall be adequate security for login and must be password-protected.
- 4) Transmission of data, information and credit information shall only be made through secure medium.



DECLARATION OF FIDELITY AND SECRECY

I, Rajesh Jain do hereby declare that I will faithfully, truly and to the best of my skill and ability, execute and perform the duties required of me as Director, of Jalan Chemical Industries Pvt Ltd ("the Company) and which properly relate to the office or position held by me in, or in relation to, the Company.

I further declare that I will not communicate or allow to be communicated to any person not legally entitled thereto any information relating to the affairs of the Company or to the affairs of any person having any dealing with the Company nor will I allow any such person to inspect, or have access to, any books or documents belonging to, or in the possession of, the Company and relating to the business of the Company or the business of any person having any dealing with the Company.

Signature



DECLARATION OF FIDELITY AND SECRECY

I, Ketan Joshi do hereby declare that I will faithfully, truly and to the best of my skill and ability, execute and perform the duties required of me as the Statutory Auditor of Jalan Chemical Industries Pvt Ltd ("the Company) and which properly relate to the office held by me in, or in relation to, the Company.

I further declare that I will not communicate or allow to be communicated to any person not legally entitled thereto any information relating to the affairs of the Company or to the affairs of any person having any dealing with the Company nor will I allow any such person to inspect, or have access to, any books or documents belonging to, or in the possession of, the Company and relating to the business of the Company or the business of any person having any dealing with the Company.

Signature



DECLARATION OF FIDELITY AND SECRECY

I, _____ do hereby declare that I will faithfully, truly and to the best of my skill and ability, execute and perform the duties required of me as Senior Executive of Jalan Chemical Industries Pvt Ltd ("the Company) and which properly relate to the office or position held by me in, or in relation to, the Company.

I further declare that I will not communicate or allow to be communicated to any person not legally entitled thereto any information relating to the affairs of the Company or to the affairs of any person having any dealing with the Company nor will I allow any such person to inspect, or have access to, any books or documents belonging to, or in the possession of, the Company and relating to the business of the Company or the business of any person having any dealing with the Company.

Signature



DECLARATION OF FIDELITY AND SECRECY

I, _____ do hereby declare that I will faithfully, truly and to the best of my skill and ability, execute and perform the duties required of me as an employee of Jalan Chemical Industries Pvt Ltd ("the Company") and which properly relate to the office or position held by me in, or in relation to, the Company.

I further declare that I will not communicate or allow to be communicated to any person not legally entitled thereto any information relating to the affairs of the Company or to the affairs of any person having any dealing with the Company nor will I allow any such person to inspect, or have access to, any books or documents belonging to, or in the possession of, the Company and relating to the business of the Company or the business of any person having any dealing with the Company.

Signature



DECLARATION OF FIDELITY AND SECRECY

I, Dhiraj Bhutoria do hereby declare that I will faithfully, truly and to the best of my skill and ability, execute and perform the duties required of me as director, of Jalan Chemical Industries Pvt Ltd ("the Company) and which properly relate to the office or position held by me in, or in relation to, the Company.

I further declare that I will not communicate or allow to be communicated to any person not legally entitled thereto any information relating to the affairs of the Company or to the affairs of any person having any dealing with the Company nor will I allow any such person to inspect, or have access to, any books or documents belonging to, or in the possession of, the Company and relating to the business of the Company or the business of any person having any dealing with the Company.

Signature



DECLARATION OF FIDELITY AND SECRECY

I, Vaibhav Anil Jain do hereby declare that I will faithfully, truly and to the best of my skill and ability, execute and perform the duties required of me as director, of Jalan Chemical Industries Pvt Ltd ("the Company) and which properly relate to the office or position held by me in, or in relation to, the Company.

I further declare that I will not communicate or allow to be communicated to any person not legally entitled thereto any information relating to the affairs of the Company or to the affairs of any person having any dealing with the Company nor will I allow any such person to inspect, or have access to, any books or documents belonging to, or in the possession of, the Company and relating to the business of the Company or the business of any person having any dealing with the Company.

Signature

