

POLICY ON RELATED PARTY TRANSACTIONS

1. Preamble

The Board of Directors of R K Wire Products Limited (the Company) has adopted the following policy and procedure to regulate Related Party Transactions between the Company and its related parties based on provision of SEBI (LODR) Regulations, 2015 and other applicable laws.

2. Purpose

The policy is devised to ensure proper approval and reporting on materiality of Related Party Transactions and also on dealing with Related Party Transactions between the Company and its Related Parties.

3. Related Party and Related Party Transaction

3.1. For the purpose of this policy, an entity shall be considered as related to the Company if:

- (i) such entity is a related party under Section 2(76) of the Companies Act, 2013; or
- (ii) such entity is a related party under the applicable accounting standards.

3.2. Related Party Transaction means transaction in the nature of contract involving transfer of resources, services or obligations between a company and a related party, regardless of whether a price is charged.

4. Review and approval of Related Party Transaction

Every Related Party Transaction shall have prior approval of the Board Level Audit Committee.

While considering any transaction, the Committee shall take into account all relevant facts and circumstances including the terms of the transaction, the business purpose of the transaction, the benefits to the Company, or any other relevant matters.

The Board Level Audit Committee may grant omnibus approval for Related Party Transactions which are (i) repetitive in nature; (ii) in ordinary course of business; (iii) are on arm's length basis, and (iv) within the material limits.

The Board Level Audit Committee has laid down criteria for granting omnibus approval in line with this policy. The omnibus approval where granted shall be valid for a period not exceeding one financial year and shall require fresh approval after the expiry of such financial year. The approval shall specify the following:

- a) Name(s) of the related party.
- b) Nature of transaction.
- c) Maximum amount of transaction that can be entered into.
- d) Period of transaction.
- e) The indicative base price/current contracted price and the formula for variation in the price, if any.

f) Any other condition as deemed fit and proper by the Board Level Audit Committee.

The Board Level Audit Committee shall review, at least on a quarterly basis, the details of RPTs entered into by the company pursuant to each of the omnibus approval given. Such approval of Board Level Audit Committee may be obtained by way of circular resolution or at a duly convened meeting of the Audit committee.