

# QRG Investments and Holdings Limited

## IT Governance Policy

Version 1.0

<b>QRG Investments &amp; Holding Limited</b> IT Governance Policy Version 1.0 <b>Internal</b>	
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**Document Approvers**

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## 1. Introduction

The Reserve Bank of India (RBI) had issued the guidelines on Information Technology Framework for Non-Banking Finance Companies (NBFCs) in Master Direction DNBS.PPD.No.04/66.15.001/2016-17 (as and when amended) to enhance safety, security, efficiency in processes leading to benefits for NBFCs and their customers are enclosed.

NBFCs are required to formulate a Board approved IT policy, in line with the following objectives:

- a) An IT organizational structure commensurate with the size, scale and nature of business activities carried out by the NBFC;
- b) NBFCs may designate a senior executive as the Chief Information Officer (CIO) or in-Charge of IT operations whose responsibility is to ensure implementation of IT Policy to the operational level involving IT strategy, value delivery, risk management and IT resource management.
- c) To ensure technical competence at senior/middle level management of NBFC, periodic assessment of the IT training requirements should be formulated to ensure that sufficient, competent and capable human resources are available.
- d) The NBFCs which are currently not using IPv6 platform should migrate to the same as per National Telecom Policy issued by the Government of India in 2012. (As per Circular DNBS(Inf.).CC.No 309/24.01.022/2012-13 November 08, 2012)

In accordance with the above regulations Board of QRG IHL has approved this IT and Cyber Security Policy

## 2. IT Governance

IT Governance is an integral part of corporate governance. It involves leadership support, organizational structure and processes to ensure that the QRG IHL's IT sustains and extends business strategies and objectives. Effective IT Governance is the responsibility of the Board of Directors and Executive Management.

Well-defined roles and responsibilities of Board and Senior Management are critical, while implementing IT Governance. Clearly-defined roles enable effective project control. People, when they are aware of others' expectations from them, are able to complete work on time, within budget and to the expected level of quality. IT Governance Stakeholders include: Board of Directors, IT Strategy and Steering Committee, Business Executives, Chief Information Officer (CIO), Chief Technology Officer (CTO), and Risk Committees.

The basic principles of value delivery, IT Risk Management, IT resource management and performance management must form the basis of governance framework. IT Governance has a continuous life-cycle. It's a process in which IT strategy drives the processes, using resources necessary to execute responsibilities. Given the criticality of the IT, QRG IHL follows relevant aspects of such prudential governance standards that have found acceptability in the finance industry.

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### **3. IT Strategy and Steering Committee**

The composition of the committee is:

Shri Sunil Behari Mathur- Chairman  
Shri Surender Kumar Tuteja  
Shri Anil Rai Gupta  
Shri Ramesh Kumar Sharma

The IT Strategy and steering Committee should meet at an appropriate frequency but not more than six months should elapse between two meetings. The Committee shall work in partnership with other Board committees and Senior Management to provide input to them. It will also carry out review and amend the IT strategies in line with the corporate strategies, Board Policy reviews, cyber security arrangements and any other matter related to IT Governance. Its deliberations may be placed before the Board.

### **4. Roles and Responsibilities of IT Strategy and Steering Committee**

Some of the roles and responsibilities include:

- Approving IT strategy and policy documents and ensuring that the management has put an effective strategic planning process in place;
- Ascertaining that management has implemented processes and practices that ensure that the IT delivers value to the business;
- Ensuring IT investments represent a balance of risks and benefits and that budgets are acceptable;
- Monitoring the method that management uses to determine the IT resources needed to achieve strategic goals and provide high-level direction for sourcing and use of IT resources;
- Ensuring proper balance of IT investments for sustaining the Company's growth and becoming aware about exposure towards IT risks and controls.
- For Steering Committee: Monitoring of the progress of the project, including deliverables to be realized at each phase of the project and milestones to be reached according to the project timetable.

### **5. Detailed IT and Cyber Security Framework**

In continuation to this overall IT and Cyber Security Policy the Board has also approved various other IT and Information security related sub policies to provide a comprehensive IT and Cyber Security framework for QRG IHL.

### **6. Document Management**

- This policy will be reviewed as and when required.
- This procedure replaces any other procedure issued earlier by the Company to the extent specifically covered here. This policy should be followed both in letter and spirit.
- The Company is committed to continuously reviewing and updating policies and procedures-based on the Company's risk assessment and incorporating any regulatory requirement as maybe required.
- Any amendment to this procedure or issue of any guidance or circular etc. under this procedure has to be approved in writing by the approving authority.

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