

SATYA SHYAM TRADING LIMITED

Related Party Transaction Policy as per Clause 49 of the Listing Agreement

1. Preamble

The Board of Directors (the "Board") of Satya Shyam Trading Limited (the "Company"), has adopted the following policy and procedures with regard to Related Party Transactions as defined below. The Audit Committee will review and may amend this policy from time to time.

This policy will be applicable to the Company . 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 the Companies Act and Clause 49 of the Listing Agreement entered by the Company with the Stock Exchanges and intended to ensure the proper approval and reporting of transactions between the Company and its Related Parties. Such transactions are appropriate only if they are in the best interest of the Company and its shareholders. 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. Terms and References

"Material Related Party Transaction" Contracts/ arrangements with a related party shall be considered as Material Related Party contracts/arrangements if the transaction 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 and any amendment thereof

4. Policy

All related party Contracts/ arrangements shall be entered on arm's length basis.

In exceptional circumstances, where permitted by law, related party Contracts/ arrangements may deviate from the principal of arm's length, after approval from Audit Committee.

All related party Contracts/ arrangements shall comply with the Companies Act 2013.

All related party Contracts/ arrangements shall comply with the Listing Agreement.

All related party Contracts/ arrangements shall comply with the Accounting Standards.

Approval of Audit Committee shall be taken for related party Contracts/ arrangements as require under the companies Act and the Listing Agreement.