

**MANAGEMENT
INFORMATION
SYSTEM
Policy
____ (Revised) ____**

**Sital Leasing &
Finance Limited**

**Duly approved by the Board of Directors vide resolution
dated 29th June, 2021**

S I T A L
Leasing & Finance Ltd.

Summary of Policy

Policy Name	Management Information System Policy
Issue and Effective date	April 19, 2011
Date of Policy Framed & adopted	May 27, 2017
Date of last review	May 27, 2017
Date of current review	June 29, 2021
Date of next review	On or before June 2022
Periodicity of review	Annual
Owner / Contact	Compliance
Approver	Board of Directors

Company Profile

Sital Leasing & Finance Limited (Hereinafter referred to as "SLFL" or / "the Company")

The company is incorporated under the Companies Act, 1956 having Corporate Identification Number (CIN) L65910HR1983PLC050169. The registered office of the company is located at 322, 3rd Floor, SS Plaza Commercial Complex, Mayfield, Garden, Sector-47, Gurgaon, Haryana -122001 and the Corporate office located at 16/121-122, Jain Bhawan, Faiz Road, Karol Bagh, New Delhi-110005.

The company has been incorporated on 10/10/1983. "SLFL" is a listed entity and duly listed on Metropolitan Stock Exchange of India Ltd (MSEI).

"SLFL" is a registered as Non-Banking Financial Institution having a valid license Registration No. B-14.02131 dated 21st Dec, 2001.

"SLFL" is categorized as Non-Deposit Taking Systematically Importance (NDSI) Non-Banking Financial Company. At Present, the RBI has classified as NBFC-ICC category.

(*As per RBIs notification, three categories of NBFC has been merged, these three categories of NBFC are Asset Finance Company (AFC), Loan Company and Investment Company. These three categories are merged into a new category called **NBFC-Investment and Credit Company (NBFC-ICC).**)

"SLFL" being a registered NBFC with RBI has been primarily engaged into (a) Investing in equity/securities of listed and unlisted companies and (b) Lending activities.

The Policy guidelines governing the lending activity of "SLFL" are brought out in the following chapters. The policy guidelines would be reviewed annually delineating the focus areas of the Company.

"SLFL" may gives loans against shares / liquid securities, promoter funding, personal loan, short/medium/long term corporate loans to SME and Mid-size corporate with or without security.

"SLFL" lending culture would be guided by the 'Fair Practice Code' as approved by the Board of Directors as also the approved Risk Policy and Know Your Customer (KYC) Policy.

Introduction

This MIS Policy sets out responsibilities and requirements for those managing Computer Systems.

1. Definitions

- System Manager – someone who configures and maintains a multi-user computer or software application service
- Back out plan - a planned course of action to restore a system to its previous state.

This document includes statements on:

- System managers
- Responsibilities and duties of system managers
- System change management
- Access control
- Monitoring and logging system activity
- Importing software and files
- System clocks

2. System managers

- 2.1. The Company's computer systems must be managed by competent staff to oversee their day-to-day running and to preserve security and integrity:
- 2.2. Management Information System policy applies to all staff that use administrator privileges on Company's multi-user computer or software application service.

3. Responsibilities and duties of system managers

- 3.1. System managers have a key role to play in ensuring confidentiality, integrity and availability of information and information systems. They are responsible for endeavoring to ensure correct and secure operation of computers in accordance with Company's departmental policies.
- 3.2. Computer system managers are required to be aware of Company's information security policies in general. They must be familiar with this document and these other documents which are of particular relevance to system managers:
 - Network Management Policy
 - Information Handling Policy
 - Software Management Policy
 - Use of Computers Policy
 - Computer Account Passwords
 - Institutional IT Usage Monitoring and Access

- 3.3. System managers must take into account the confidentiality and value of the information they are managing, and the impact that a serious incident may have, when determining what security controls and risk mitigation measures to use. It is recommended that system managers perform a risk assessment on deploying new systems and from time to time thereafter.
- Managing Information Asset Security
- 3.4. System managers are required to be proactive in working with information owners to help ensure that security requirements, expectations and limitations are mutually understood and agreed. A basic example of this is to ensure that information owners are aware of the backup arrangements, ensure that backups take place as specified and keep information owners informed of any changes or problems. For policy on making backups refer to the "Backups" .
- 3.5. Basic information about the security posture of a computer system should be made available to its users by the system manager. This is intended to enable information owners or custodians to make an informed decision as to whether the system meets their security requirements. This information should not include any details that would be of practical use to potential intruders; however, it might outline:
- Physical security of the system and its data storage.
 - Access control.
 - Operating environment.
 - Backup frequency and security of backup data
 - Firewalling and protection against malware
 - Monitoring and systems administration staffing
 - Relevant policies implemented.
 - Uses for which the system is not suitable
- 3.6. Recognised managers of computer and network systems are encouraged to promote and implement information security policy. They are authorized to act promptly to protect the security of the systems and information for which they have responsibility. There must, however, be reasonable grounds for taking actions which impact users such as: temporarily removing devices from the network, disabling software or system functionality, or locking user accounts.
- 3.7. System managers and staff who have elevated access privileges are prohibited from going beyond the boundaries of their legitimate professional duties in relation to accessing users' computer data. Any access to, or disclosure of, the contents of user data or communications must be appropriate, justified and follow correct procedures.

3.8. System managers must be vigilant and immediately seek advice through their line management if they become, or are made, aware that any information served by the systems for which they have responsibility may:

- Not be lawful.
- Contain direct links to material which is unlawful
- Purport to trade on the Company's name in a commercial activity or goods without the approval of the Company
- Promote unapproved commercial activity
- In any way damage the Company's name or reputation
- Not comply in some other way with Company's policies

4. System change management

4.1. Changes to computer systems that provide a user service must be planned, tested, approved, published and implemented in a controlled manner.

- It is recommended that an appropriate “change management” procedure is established and followed for systems other than those managed and used exclusively by an individual user and where the changes would not put at risk other Company’s systems or services
- The change management procedure should involve stakeholders, create an audit trail, consider security implications, and include communication to users about forthcoming changes. (Change management is intended to help minimize and manage undesirable impacts on service users and the business.)
- The planning and testing of changes should include consideration of security factors including: information confidentiality requirements, data access controls, exposure of network services, known issues with software, data backup and the business continuity plan
- Preparation for a change should include formulation, and where possible testing, a “back out plan”.
- Where possible, and always for key systems, testing should be undertaken in a separate test environment or using another method that avoids significant risk to the service
- Changes to systems must be approved by management before made live or moved to the live environment
- System managers should ensure that system users are advised about forthcoming changes before implementation

5. Access control

- 5.1. Access to all Company information services and computer systems must be via a secure log on process, except for read-only access to public domain information.
- 5.2. Granting of access to Company IT resources should be carefully controlled. There should be formal procedures in place for granting, changing and revoking access to information systems and services for handling the various scenarios.
- 5.3. Company IT system managers must wherever technically possible enforce password policy.
 - Use of Computers
 - Computer Account Passwords
- 5.4. The individual responsible for each computer account must be identifiable. This also applies to group accounts to the extent that the individual responsible for management of the account is known and can identify all others with access.
- 5.5. The Administrator account, or administrator level access, should be used only at times when it is necessary to perform specific system administration or configuration tasks. (Unnecessary routine use of administrator level access by system managers has been a factor in many system compromises.)
- 5.6. System managers must ensure that user privileges are configured on the basis of “least privilege”, i.e. Users should not be granted privileges to do things that they do not need to do and which might cause problems. Access to any operating system commands and utility programs which elevate the privilege of the user should also be appropriately restricted.
- 5.7. System managers should normally not allow users to work with elevated privileges (for example by placing normal user accounts in the “Administrator” or “Power Users” group on Windows systems). In exceptional cases, for example where technical problems require elevated privileges to make legacy or badly designed applications work, system managers should endeavor to work round or remove the problems - there is usually a more secure solution.
- 5.8. Access to files, folders and other resources should, wherever possible, be managed using group permissions rather than by individual account. The purpose, or intended membership, of each group should be defined clearly, for example “users”, “administrators”, “backup operators”, “managers” etc. The membership of each group should be correctly set and periodically reviewed.
- 5.9. Wherever appropriate and possible, systems and applications should be configured so that inactive connections shut down after a defined period of inactivity to help prevent access by unauthorized persons.

5.10. Recommended access controls for sensitive or high risk systems include:

- Allocate privileges through a formal authorization process
- Maintain a record of any access permissions granted that exceed basic user permissions.
- Maintain documentation of the purpose or intended membership of user groups.
- Log and preferably actively monitor access to help identify signs of misuse.

5.11. For very sensitive or high risk systems additional recommended access controls include:

- Limit privileged access according to physical or network location
- Control privileged access based on time of day
- Use of secondary security tokens
- Use a secure console server arrangement.

6. Monitoring and logging system activity

- 6.1. Logging and monitoring of computer system activity should be implemented to adequately support security, compliance and capacity management.
- 6.2. System managers must act on any current legal compliance requirements pertaining to logging that apply to their systems.
- 6.3. The Data Protection Act requires that personal data is deleted when no longer needed for the purpose for which it was originally obtained. Procedures should therefore be implemented to ensure obsolete log data containing personal data (such as usage information by username) is deleted.
- 6.4. For systems where an intrusion or misuse could have a significant impact on the Company, at the minimum, basic usage logging should be undertaken. This may consist of recording logs showing when users were logged in, when they accessed system resources etc.
- 6.5. Where logging is undertaken with a view to possibly using the logs as evidence in the case of an intrusion, then it is recommended that the logs are recorded on a different system to the one being monitored. (Usage logs are likely to be deleted or modified by an intruder.)
- 6.6. System logging can often be configured to record both successful and failed attempts to access system resources. For sensitive systems, audit logging may be configured to record access failures, which may indicate an intrusion attempt or operational problem.
- 6.7. Capacity demands of systems supporting business processes should be monitored and projections of future capacity requirements made to enable adequate processing power, storage and network capacity to be made available. System managers should report capacity risks or concerns that they have identified to their line manager.

6.8. Major systems, configured to produce useful levels of security and operational log information, typically produce more data than it is realistic to monitor manually. Where the sensitivity of a system justifies it, use of automated log monitoring and alerting technology is recommended to help make best use of security and operational log data.

7. Importing software and files

7.1. Software and data files intended for installation on critical computer systems should be downloaded or installed into a secure environment, scanned for malicious software and tested in a test environment before deployment in a live environment.

8. System clocks

8.1. All networked computers should be referenced to a reliable time server. Incident investigation often depends on accurate event log dates and on examining creation and modification dates of files and folders.

AMENDMENTS

The Board may amend the provisions of this Policy from time to time. Unless otherwise specified, such amendments shall be effective from the date of the Board meeting at which such amendments are approved.

GRIEVANCES / COMPLAINTS

All customers & borrowers or guarantors, current or past, can and should contact the company's Nodal officer for any grievances or complaints (including complaints against any policy, employee or representative, etc.) by following means:

Grievance Redressal Officer	:	Mr. Surendra Kumar Jain
Designation	:	Managing Director
Corp. Office	:	16/121-122, Jain Bhawan, Faiz Road, Karol Bagh, New Delhi-110005
Contact No.	:	9891709895
Email	:	sitalleasing83@gmail.com, sitaleleasing@gmail.com
Website	:	www.sitalleasingfinance.com

**For and On Behalf of
SITAL LEASING AND FINANCE LIMITED**

**Surendra Kumar Jain
Managing Director
DIN: 00530035
Address: 555, Double Storey,
New Rajendra Nagar,
New Delhi-110060
Date: 29/06/2021
Place: New Delhi**

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Leasing & Finance Ltd.