

SUMMIT SECURITIES LIMITED
DIVIDEND DISTRIBUTION POLICY

I	Introduction:
	<p>Regulation 43A of the Securities Exchange Board of India (“SEBI”) (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘the Listing Regulations’), with effect from May 5, 2021, mandates top 1000 listed entities, determined on the basis of their market capitalization calculated on March 31 of every financial year to formulate a Dividend Distribution Policy.</p> <p>Since the company comes in the above class, in compliance with Regulation 43A of the Listing Regulations, the Company has framed this Dividend Distribution Policy.</p>
II	Objective
	This Policy aims to help the investors and Stakeholders in their investing decisions.
III	Regulatory Framework:
	The Dividend, if any, declared by the Company (including Interim Dividend) shall be governed by the provisions of the Companies Act, 2013 read with the Companies (Declaration and Payment of Dividend) Rules, 2014, the Listing Regulations, RBI Act, 1934, read with relevant Regulations / Notifications / Circulars issued thereunder and the provisions of Articles of Association of the Company, as in force time to time, to the extent applicable to the Company (hereinafter collective referred as “Applicable Laws”).
IV	Parameters/factors to be considered for declaration of dividend
A	General:
	The Board shall recommend dividend if it is of the opinion that it is financially prudent to do so.

B	Financial and Internal Parameters:
	<p>The Board would consider the following financial and other parameters before declaring interim dividend or recommending a final dividend to shareholders for declaration:</p> <ul style="list-style-type: none"> • Profit after tax earned during the year. • Investment Prospects both short term and long term • Standalone operating Cash inflows. Since it is an investment company, income is dependent on dividends received from investee companies, which may vary year to year. • Liquidity position of the company Investments in subsidiaries • Financial ratios. • Unforeseen events and contingencies with financial implications and Cash flow required to meet such contingencies; • Tax impact of the dividend and the cash outflow post tax, as per applicable laws
C	External Parameters:
	<p>The Board shall also consider inter-alia the following external factors i.e. factors on which the Management or the Company has no control, while declaring an interim dividend or recommending a final dividend:</p> <ul style="list-style-type: none"> • General Business and economic Environment • Regulatory restrictions, if any or the prevalent statutory requirements • Provisions of Tax laws governing dividend • Change in Government Policy, which can have a financial impact on the Company • Volatility in Financial markets and interest rate regime
V	Circumstances under which the shareholders may or may not expect dividend:
	<p>As the company is an investment company which is engaged on long term investments, the profits may vary from year to year as its major income is dividend from investee companies. The Board may propose not to recommend dividend after analysis of various parameters including those listed above, cash flow position, better opportunities for investment of funds. and in case funds needed for buy-back of existing share capital.</p>

VI	Policy as to how the retained earnings shall be utilized
	The profits being retained in the business shall be be deployed in a manner to deliver sustainable long-term value to all its stakeholders.
VII	Parameters that shall be adopted with regard to various classes of shares:
	Currently the company has only one class of equity shares with equal voting rights. The holders of the Equity Shares of the Company as per the Issued and Paid-up capital, on the record date, are entitled to receive dividends. The other classes of shares for e.g. Preference Shares or Shares with differential voting rights, if any, will be governed by the terms of issue of such shares. Any convertible instruments issued by the Company shall be entitled for dividend only upon conversion.
VIII	Procedure with respect to dividend:
	<ul style="list-style-type: none"> • The Board upon perusing the rational for proposed pay-out, may recommend a final dividend or declare an interim dividend. • The final dividend recommended by the Board is subject to declaration by the shareholders in the ensuing Annual General Meeting. • The interim dividend declared by the Board shall be placed for confirmation before the shareholders in the ensuing Annual General Meeting. • The CFO shall recommend to the Board transfer of such percentage of profits for that financial year as deemed appropriate to the reserves of the Company and the Board may decide on the same. • In case of inadequacy of profits for any financial year, the Board may approve declaration of dividend out of accumulated profits of the previous years as per this Policy and the Regulatory Framework.
IX	Disclosure:
	The Company shall make appropriate disclosures as required under the Applicable Laws.

X	Amendments:
	<p>The Board of Directors may amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.</p> <p>In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail notwithstanding the provisions hereunder from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.</p>
XI	<p>Approving Authority and Effective Date:</p> <p>This Policy has been approved by the Board of Directors at their meeting held on August 13, 2021.</p>