

November 22, 2019

To, The Secretary BSE Limited Security Code - 517385	To, The Secretary National Stock Exchange of India Limited Symbol - SYMPHONY
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Sub.: Disclosure of Related Party Transaction for the half year ended September 30, 2019

Dear Sir,

Pursuant to Regulation 23 (9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith disclosure of Related Party Transactions on a consolidated basis drawn in accordance with applicable accounting standards for the half year ended September 30, 2019.

Please note that such details of related party transactions will also be available on the Company's website www.symphonylimited.com.

Kindly take the above on your record.

Thanking you,

Yours truly,
For, **Symphony Limited****Mayur Barvadiya**
Company Secretary

Enc. As above

Related Party disclosure for Symphony Limited on a consolidated basis – for the Half year ended September 30, 2019

(i) List of Related Parties with whom transactions have taken place and relationships:

Sr. No.	Name of the Related Party	Relationship
1.	Achal Anil Bakeri	Key Managerial Personnel (KMP)
2.	Nrupesh Shah	Key Managerial Personnel (KMP)
3.	Elephant Design Pvt. Ltd.	Enterprise in which director has significant influence

(ii) Transactions during half year ended September 30, 2019 with Related Parties:

Sr. No.	Name of the Related Parties	Nature of relationship with company	Nature of transaction	Rs. In crores
				Volume of transactions during half year ended 30-09-2019
1	Elephant Design Pvt. Ltd.	Enterprise in which Director has significant influence	Consultancy Expense & reimbursement of Travelling Expense	0.24

Compensation of key management personnel:

The remuneration of directors and other members of key management personnel during the half year was as follows:

Short-term benefits	Rs.0.27 crores
Post-employment benefits	Rs.0.01 crores
	Rs.0.28 crores
Balance outstanding at the end of the period	Nil

Policy on dealing with Related party transactions:

The Company has made a list of related parties after considering the requirements and based on the annual declaration received from individuals like Directors and Key Managerial Personnel (KMP). All related party transactions are reported and referred for approval to the Audit Committee as per section 177 of the Companies Act, 2013. The Audit committee may grant general approval for repetitive related party transactions. Such general approval will be valid for a period of one year and a fresh approval shall be taken for every financial year. As per section 188 of the Companies Act, 2013, the consent of the Board/Shareholders' approval is required, by a special resolution in a general meeting, for entering into the specified transactions with a related party, if they are not in ordinary course of business of the Company or at arm's length and exceeds the threshold limits as specified in the Act.

Note:

- (i) Above mentioned remuneration and perquisites does not include performance linked remuneration which are not finalized yet. However, The Company has provided Rs.1.73 crores towards the same in half yearly results.
- (ii) Above figures does not include gratuity provision.

