

INVESTMENT POLICY REVIEWED & APPROVED IN BOARD OF DIRECTORS MEETING HELD ON 29.01.2025

THE SUNDARGARH DISTRICT CENTRAL COOPERATIVE BANK LTD., SUDNARGARH



INVESTMENT POLICY

Regd. No. 90/SG 90/SG 01.06.1955

The investment policy is prepared by keeping in view the various regulatory, statutory and bank's internal own guidelines, also, The Policy gives the Bank's key policies, main operational guidelines and major regulatory requirements regarding investment operations of the Bank domestic instruments.

The Bank makes investment and transacts in various types of domestic Securities/instruments for the following main purposes:-

- a. To comply with Statutory Liquidity Ratio (SLR) and Cash Reserve Ratio (CRR) requirements as informed by accounts department.
- b. To effectively manage liquidity.
- C. To attain the required maturity pattern of securities.
- d. To maximise yield on investments.
- e. To earn trading profit.

The Bank's overall approach and the key control elements of investment operations are outlined in this Investment Policy of the Bank. The policy shall remain valid unless some change/ changes are warranted / desired. Such changes shall be placed before the Board of Directors for approval by giving the details of existing provisions, changes proposed, reasons for change, benefit to the Bank, RBI / Government guidelines etc. while amending any of the provisions, suggestions by IDRBT, FIMMDA/PDAI/CCIL may also be duly considered. However, the investment Policy shall be reviewed each year.

In all investment decisions / transactions, the Bank shall at all time give due consideration to the safety and liquidity aspect of its security portfolio. All investment proposals would be considered from the point of view of rating of the instrument, maturity, liquidity, yield, security and capital appreciation etc., before deciding upon any investment. The Bank shall also follow sound and acceptable business practices and the directives issued from time to time by the Reserve Bank of India and other regulatory authorities for undertaking the investment activities. It also be ensured that investment portfolio of the bank should have diversified investments to avoid concentration risk.

The investment activities would be carried out by the concern officials of the Bank under the overall supervision of the Head of Treasury. The Board reviewed the existing Investment policy of the bank point wise and made the following addition/changes and approved the same for adoption keeping others points intact.

Para 4.

Exposure Limit:

i) Following Exposure limit has been fixed against each type of investment.

Particulars	Limits
 A) SLR investments. Govt. of India dates securities State Development Loans / State Govt. Securities Govt. of India Treasury Bill B) Inter-Bank Deposit 	40% of the total deposit and own fund of the Bank To be fixed by the Investment Committee from time to time
C) Negotiated Dealing System- CALL	As per the Prudential Limit fixed by the Board of Management from time to time 10% of the previous F/Y deposits position.
D) Non-SLR investments. (a) "A" or equivalent and higher rated Commercial Papers (CPs), debentures and bonds. (b) Units of Debt Mutual Funds and Money Market Mutual Funds. (c) Shares of Market Infrastructure Companies (MICs), e.g. Clearing Corporation of India Ltd. (CCIL), National Payments Corporation of India (NPCI), Society for World-wide Inter-bank Financial Telecommunication (SWIFT).	Total Non-SLR investments shall not exceed 10% of the total deposits of a bank as on March 31 of the preceding financial year.

- ii) For any particular Govt. Security maximum exposure shall be limited to ₹ 30.00 Crore
- iii) Total daily transaction (Sale & Purchase) shall not exceed ₹ 30.00 Crore.



- iv) Trading exposure shall be limited to ₹ 30.00 Crores per day.
- v) Any deal up to ₹ 10.00 Crore shall be decided by the Chief Investment Officer.
- vi) Beyond ₹ 10.00 Crore deals shall be approved by the Chief Executive Officer.
- vii) In case of any odd lot total, the Chief Investment Officer is to take prior approval of the Chief Executive Officer (CEO).
- viii) We have been granted the Negotiated Dealing System- CALL membership by RBI vide letter no FMRD.CO.FMID NO.S 234/10.05.065/2023-2024 dated 13TH October 2023.

1	MEMBERSHIP NAME	THE SUNDARGARH DISTRICT CENTRAL CO OPERATIVE BANK LIMITED
2	NDS- CALL MEMBERSHIP NO.	50588
3	MEMBER LUD ID	70006

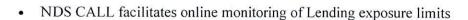
Negotiated Dealing System- CALL

Introduction:

"Negotiated Dealing System- CALL" system allows members to negotiate bilaterally for borrowing and lending funds in Call/Notice/Term market. It provides **screen based** equitable access to all members for dealing in money market. It is a form of Request for Quote system wherein in quotes can be asked/ given to known counterparties. It automatically monitors regulatory limits as applicable to the member entity based on deals done in the system.

Features:

- NDS CALL facilitates immediate and online dissemination of market information to all the market participants.
- NDS CALL monitors regulatory prudential borrowing and lending limits with each trade/quote entered by members in the system.



- NDS CALL provides a functionality of "Group Quote" wherein multiple members are given quote at the same time.
- NDS CALL facilitates calculation of benchmark MIBOR rates for various maturities.

Benefits:

- Auto monitoring of Regulatory limits.
- Allows placement of group quotes; can negotiate with multiple counterparties at same time.
- · Facilitates counterparty exposure limit setting.
- Online updation of market info.

Prudential Limit for Negotiated Dealing System- CALL:

As required by RBI vide their Notification No RBI/2021-22/78 FMRD.DIRD:01/14.01.001/2021-22 dated April 01, 2021 and updated on June 08, 2023 and as per their Master Circular, our prudential limits for borrowing/lending in Call/Notice Money Markets as approved by our Board stands revised as under:-

Regulatory Limits		Amount (₹ in Crores)
Maximum Call Borrowing	Daily	NIL
	Fortnightly Average	NIL
Maximum Call Lending	Daily	₹ 121.00
	Fortnightly Average	₹ 121.00

Guidelines for NDS CALL Transaction:

All the transactions regarding NDS CALL should be made according to the NDS-CALL-GUIDING PRICIPLES mentioned by Reserve Bank of India.

Chief Executive Officer

Sundargarh Dist. Central Cooperative Bank Ltd
CHIEF EXECUTIVE OFFICE
SUNDARGARH DIST. CENTRAL
CO-OP BANK LTD.
SUNDARGARH

Sundargarh Dist. Central Cooperative Bank Ltd

PRESIDENT
SUNDARGARH DIST. CENTRAL
CO-OP BANK LTD
SUNDARGARH



INVESTMENT POLICY

THE SUNDARGARH DISTRICT CENTRAL COOPERATIVE BANK LTD.,
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Page 1 of 8

THE SUNDARGARH DISTRICT CENTRAL CO-OPERATIVE BANK LTD, SUNDARGARH

INVESTMENT POLICY

PART - (A)

In pursuance of the latest directives and guidelines issued by Reserve Bank of India (RBI) and National Bank for Agriculture and Rural Development (NABARD), the Investment policy of the Bank is as follows, which will be in force with immediate effect.

1. **OBJECTIVE**

Keeping in view the provisions of the Banking Regulation Act 1949 (AACS) and the guidelines of Reserve Bank of India and National Bank for Agriculture and Rural Development and provisions of Orissa Cooperative Societies Act 1962, the Investment Policy of the Bank aims at management of cash/funds inflow and outflow on general banking business and deployment of surplus funds in profitable avenues with the objective of maximization of profit.

2. **Modalities**

The following modalities shall be adopted for management of funds and for taking investment decisions.

- 2.1 Cash flow analysis and investment decisions.
- The daily position of cash shall be analyzed by the Funds & Account Department keeping in view the statutory provisions and other requirements under the notice of the competent authority for decision, if necessary.
- Receipt of interest and principal on investment of Government and other Trustee b) securities held in CSGL/SGL/Demat accounts on the due dates shall be analysed on a day to day basis.
- Receipt of interest on Inter Bank Deposits. c)
- Utilization of excess cash available in different branches d)
- Cash inflow and outflow depending upon release of refirance etc, repayment of e) borrowings and release of finance to branches
- Deployment of surplus funds based on the daily position available in approved f) money market instruments.
- Borrowings of funds from counter-party banks and Primary Dealers, NCDC through g) approved instruments including Repo transactions and CBLO.
- Utilization of average daily surplus on account of CRR requirement arising within the h) fortnight as per RBI stipulations
- Funds available from Government, General Insurance Corporation etc for various i) purposes
- Reconciliation of relevant transactions/accounts. j)

Permissible Investment 3.

The Bank shall go for investment in the following categories

- a) Government of India dated securities
- b) State Government securities
- c) Government of India Treasury Bills
- d) Inter Bank Deposits
- e) Call / Notice Money investments
- f) Repurchase agreement (REPO)



4. Exposure Limit

(i) Following exposure limit are fixed against each type of investment.

Particulars	Limits	
a) Govt. of India dates securitiesb) State Govt. securitiesc) Govt.of India Treasury Bill	40% of the total deposit and own fund of the Bank	
d) Inter-Bank Deposit	To be fixed by the Investment Committee from time to time.	
e) Call Money (Borrowings & Lending)	No exposure limit	

- (ii) For any particular Government security maximum exposure shall be limited to Rs.20.00 crores.
- (iii) Total daily transaction (sale and purchase) shall not exceed Rs.10.00 crores.
- (iv) Trading exposure shall be limited to Rs.10.00 crores per day.
- (v) Any deal up to Rs.5.00 crores shall be decided by the Chief Investment Officer.
- (vi) Beyond Rs.5.00 crores deal shall be approved by the Chief Executive Officer.
- (vii) In case of any odd lot deal, the Chief Investment Officer is to take prior approval of the Chief Executive Officer (CEO).

5. STOP LOSS:

The maximum permissible loss due to sale of any particular security by Investment Officer shall be limited to Re.1/- (Rupee one only) per Rs.100/- in order to limit the loss on any transaction. In exceptional cases if it is considered advantageous to hold any security even though the stop loss limits breached taking into account the yield and marketability, approval of the CEO shall be obtained.

6. CSGL Procedure:

All investments in Government securities shall be strictly dealt through CSGL account with STCI Ltd.

7. <u>Dealing with Counter Party:</u>

All purchase/sale of securities shall be dealt through Primary Dealers/Banks. Negotiation of the price shall be based on the indicative rates available through reliable sources including information from various Primary Dealers and Banks. Before finalizing the settlement, rates shall be obtained over phone/written quotations wherever available. In case of quotes obtained over telephone, the Investment Officer shall record the same in a Register to be maintained for the purpose. After receipt of the quotes, the Investment Manager in-charge of the back/mid-office shall examine the marketability, period and yield to maturity (YTM) etc. of the specific securities for taking an instant decision. There shall not be any transaction (sale or purchase) outside the CSGL account. On confirmation of the deal, letter of confirmation shall be obtained over FAX from the counter party for reconfirmation.

8. Classification of Securities

All securities shall be classified as under:

- i. Held to Maturity (HTM)
- ii. Available for Sale (AFS)
- iii. Held for Trading (HFT)

The Bank, from time to time, with the prior approval of the Managing Committee, will segregate the securities taking into account based on the requirement for SLR which will be kept under HTM category of the directives and guidelines issued by Reserve Bank of India and NABARD. In no case, the said securities will be transferred from **Held to Maturity** (HTM) to Available for Sale (AFS) or Held for Trading (HFT) within the financial year



Page 3 of 8

once the approval is accorded by the Board. When change of securities is affected from one category to another, required transactions are to be entered into the books of accounts. Again, the securities which are not traded under Held for Trading category within 90 days shall be transferred from **Held for Trading (HFT)** to **Available for Sale (AFS)**. Similarly, any securities kept under AFS beyond 90 days may be transferred from AFS to HFT taking into consideration the marketability of the securities with the approval of the Secretary. This shall be reviewed by the Managing Committee at least once in a half year. The securities under the AFS category shall be marked to market at the end of each year subject to the guidelines of the RBI / NABARD. Similarly the securities under the HFT category shall be marked to market as per the guidelines of Reserve Bank of India/NABAD from time to time.

9. Accounting

- a) On purchase of securities on payment of premium, the face value along with premium shall be charged to the Investment in Central Government/State Government securities Account (CSGL and Premium). Coupon (Interest) paid on such investment, accrued from the date of last payment shall be paid from the "interest received on investment account". On sale of the security, the value shall be credited to the investment in Central Government/State Government securities Account (CSGL and Premium). The capital gains, if any, on trading shall be credited to the "Profit on Sale of Securities" account. Interest received on sale of securities will take to the "Interest received on Investment account". Capital loss on sale of securities will be charged to the "loss on sale of securities account".
- b) On purchase of securities on discount, the face value shall be debited to the Investment in Central Government/State Government securities Account (CSGL & Premium) and the amount of discount received shall be paid to the credit of Investment in Central Government/State Government securities Account (CSGL & Premium). While on sale, Investment in Central Government/State Government securities Account (CSGL & Premium) account shall be credited to the extent of discounted value paid at the time of purchase and balance amount shall go to the "Profit on sale of securities".

c) Held on Maturity (HTM):

The securities acquired by the Banks with the intention to hold them up to maturity shall be classified under **Held to Maturity**. The investments included under **"Held to Maturity"** should not exceed 25 per cent of the Bank's total investments. The Bank' may include at its discretion, under **Held to Maturity** category, securities less than 25 per cent of total investment. The following investments will be classified under **Held to Maturity** but will not be counted for the purpose of ceiling of 25% specified for this category.

- (i) Re-capitalization Bonds received from the Government of India/State Government towards recapitalization requirements and held in their investment portfolio. This will not include recapitalization Bonds of other Banks acquired for investment purposes.
- (ii) Profit on sale of investments in this category should be first taken to the Profit & Loss account and thereafter be appropriated to the Capital Reserve Account. Loss on sale will be recognized in the **Profit & Loss account**.

d) Available for Sale (AFS).

The individual scrip in the **Available for Sale** category will be marked to market at once in a year or as per the guidelines of the RBI issued from time to time. While the net depreciation shall be recognized and fully provided for and the net appreciation under this shall be ignored. The book value of the individual securities shall not undergo any change after the revaluation.

(Note: Securities under this category shall be valued scrip-wise and depreciation/appreciation shall be aggregated).



e) Held for Trading (HFT).

Individual scrip in the **Held for Trading** category will be marked to market at quarterly or at more frequent intervals. The Book value of the individual securities in this category shall not undergo any change after **marking to market**.

- f) The Bank shall decide on the extent of holdings under Available for Sale and Held for Trading categories after considering various aspects such as basis of intent, trading strategies, risk management capabilities, task planning, manpower skills and available funds.
- g) The investment classified under **Held for Trading** category would be those from which the Bank expects to make a gain by the movement in the interest rates/market rates. Each security shall be ordinarily sold within 90 days.
- h) Profit or Loss on sale of investments in both the categories i.e. **HFT** and **AFS** will be taken to the Profit & Loss account.
- i) The Banks may shift investments to/from Held to Maturity category with the approval of the Managing Committee once in a year ordinarily at the beginning of the accounting year. No further shifting to/from this category will be considered during the remaining part of any accounting year.
- j) The Bank may consider shifting of investments from Available for Sale category to Held for Trading category with the approval of the CEO.
- k) Transfer of scrips from one category to another, under all circumstances, shall be considered at the acquisition cost/book value/market value on the date of transfer, whichever is the least, and the depreciation, if any, on such transfer shall be fully provided for.
- The provisions required to be created on account of depreciation in the Available for Sale category in any year shall be debited to the Profit & Loss account and an equivalent amount (net to tax benefit, if any, and net of consequent reduction in the transfer to Statutory Reserve) or the balance available in the Investment Depreciation Reserve Fund Account, whichever is less, shall be transferred from the Investment Depreciation Reserve Fund Account to the Profit & Loss account. In the event provisions created on account of depreciation in the Available for Sale category are found to be in excess of the required amount in any year, the excess shall be credited to the Profit & Loss account and an equivalent amount (net of taxes, if any, and net of transfer to Statutory Reserves as applicable to such excess provisions) shall be appropriated to the Investment Depreciation Reserve Fund Account to be utilized to meet future depreciation requirement for investment in this category. The amounts debited to the Profit and Loss account for provision and the amount credited to the Profit & Loss account for reversal of excess provision shall be debited respectively under the head "Expenditure-Provisions Contingencies". The amounts appropriated from the Profit & Loss account and the amount transferred from the Investment Depreciation Reserve Fund to the Profit & Loss account shall be shown as "below the line" items after determining the Profit for the year.

m) Investment Fluctuation Reserve (IFR).

With a view to building adequate reserve to guard against market risks:

(i) Bank should build up Investment Fluctuation Reserve (IFR) out of realized gains on sale of investments and subject to available net profit, of a minimum of 5 per cent of the investment portfolio. This minimum requirement should be computed with reference to investments in trading category. i.e. both AFS and HFT it will not be necessary to include investment under permanent category i.e. HTM for the purpose. However, Bank is free to build up a higher percentage of IFR up to 10 per cent of the portfolio, depending on the size and composition of their portfolio with the approval of the Managing Committee.



Page 5 of 8

- (ii) Bank should transfer maximum amount of the gains realized on sale of investment in securities to the IFR. Transfer to IFR shall be as appropriation of net profit after appropriation to Statutory Reserve.
- (iii) The IFR, consisting of realized gains from the sale of investments from the current category, would be eligible for inclusion in Tier-II capital.
- (iv) Transfer from IFR to the Profit & Loss account to meet depreciation requirement on investment would be a 'below the line' extraordinary item.
- (v) Bank should ensure that the unrealized gains on valuation of the investment portfolio are not taken to the Income Account or to the IFR.
- (vi) Bank may utilize the amount held in IFR to meet in future, the depreciation requirement on investment in securities.
- (vii) Distinction between IFR and IDR.

It may be noted that Investment Fluctuation Reserve (IFR) is created out of appropriation from the realized Net profits/out of profits earned on account of sale of investment initially held under permanent category but subsequently shifted to trading category and forms part of the reserves of the Bank qualified under Tier-II capital. Whereas Investment Depreciation Reserve (IDR) is a provision created by charging diminution in investment value to Profit & Loss account. While the amount held in IFR should be shown in the Balance Sheet as such, the amount held in IDR should be reported as Contingent provision against depreciation in investment.

10. Record and Registers.

The following Registers/Records are to be maintained for recording the investment transactions.

- (i) Deal Settlement Receipt
- (ii) Counter parts confirmation
- (iii) SGL/CSGL confirmation for deal
- (iv) Banker's confirmation
- (v) SGL/CSGL Balance certificate
- (vi) Deal Settlement Register
- (vii) Security.Register
- (viii) Purchase/Sale Register
- (ix) Gain/Loss Register
- (x) Stop Loss Register
- (xi) Investment Committee Minute Book

11. Exceptions.

Any exceptional transactions beyond the policy shall be made with the prior approval of the CEO .

12. Risk Management

The investment policy has taken in to consideration of the risk associated with trading and there is in-built system of creating reserves as per Reserve Bank of India (RBI)/NABARD guidelines.



13. Investment Committee/ALCO

For the time being, till the ALM concept is made applicable to the Bank, the Investment Committee shall look after the functions of the Asset Liability Committee (ALCO).

14. Report and Returns.

A daily report shall be presented by the Chief Investment Manager to the CEO. The monthly report shall be generated and presented to the Investment Committee while the quarterly report shall be submitted to RBI.

PART - (B)

The organisational set-up

There shall be an Investment Management Cell which shall function as a part / under Funds and Accounts Department and shall report to the Chief Executive Officer through Head of the Funds and Accounts Department presently the Asst. General Manager (Acct). The following Officers shall be entrusted with the cell to deal with the Govt. and other securities including all other deployments of funds.

- i) One Officer not below the rank of Asst. General Manager Chief Investment Manager
- ii) One Officer not below the rank of Asst. Manager Investment Manager

Chief Investment Manager.

- (i) He shall remain in overall charge of the Investment Committee.
- (ii) He shall make periodical review of the investment position both inside and outside the CSGL account and shall appraise the same to the Chief Executive Officer.
- (iii) He shall sign all the deal settlement sheets arising out of Treasury Management
- (iv) He shall place all the deals settled during a month in the Investment Committee for approval.

Investment Manager in Front Office.

- (i) He shall place, before the Chief Investment Manager daily funds position of the Bank with reference to maintenance of SLR and CRR and indicate the NDTL position of surplus/deficit of funds at the opening of the day.
- (ii) He shall make trading of Government securities and other Trustee securities by sale and purchase as per the rules specified in the Investment Policy of the Bank.
- (iii) He shall record the negotiated price after discussion with the SGL/CSGL account holders and keep the same under his custody for future reference and take instant decision for purchase/sale of GoI securities after consultation with SGL/CSGL account holders and after examining the marketability, YTM and premium to be paid etc.
- (iv) For deployment of daily cash surplus, he shall contact the SGL/CSGL account holders to ascertain daily call money market rate and shall remit the available surplus cash in consultation with Chief Investment Manager for investment in call money market.
- (v) In case of requirement of funds, he shall also contact the SGL/CSGL account holders for borrowing from call money market in consultation with the Chief Investment Manager and borrow maintaining all formalities.
- (vi) For deployment of seasonal surplus funds, he shall contact the local Commercial Banks/Private Banks and invest/withdraw along with renewals considering the market trend and future requirements of funds of the Bank in consultation with the Chief Investment Manager.
- (vii) He shall ensure collection of half-yearly interest and principal on its due dates on all type of securities held in NABARD/CSGL/Demat and in the safe custody.



- (viii) He shall obtain deal settlement sheets from the SGL/CSGL account holders on the same day and ensure maintenance of up to date accounts in the CSGL account.
- (ix) He shall maintain all records of daily transactions and prepare vouchers accordingly.
- (x) In absence of the Chief Investment Manager he shall exercise the powers of the Chief Investment Officer subject to control under CEO of the Bank.
- (xi) He shall maintain all registers and records of the Treasury Management and shall prepare all the reports including valuation of securities relating to the Treasury Management.
- (xii) He shall reconcile all the deposit accounts and CSGL account and Demat account maintained by the Treasury Management of the Bank.
- (xiii) He shall verify the daily funds position of the Bank with reference to maintenance of SLR and CRR and indicate the NDTL position of surplus/deficit of funds at the opening of the day.
- (xiv) He shall verify and recommend the trading of Government securities and other Trustee securities by sale and purchase as per the rules specified in the Investment Policy of the Bank.
- (xv) He shall take instant decision for purchase/sale of GoI securities after consultation with SGL/CSGL account holders and after examining the marketability, YTM and premium to be paid etc. and recommend the deal for approval of the Chief Investment Manager.
- (xvi) He shall recommend to the Chief Investment Manager for deployment of daily cash surplus, after confirming daily call-money market rate.
- (xvii) In case of requirement of funds, he shall recommend to the Chief Investment Manager for borrowing from call-money market after maintaining all formalities.
- (xviii) For deployment of seasonal surplus funds, he shall recommend the Chief Investment Manager about the market trend and future requirement of funds of the Bank.
- (xix) He shall remain in overall charge of the investment portfolio of the Bank subject to control of the Chief Investment Manager.
- (xx) He shall ensure that deal settlement sheets from the SGL/CSGL account holders are collected on the same day and ensure maintenance of up to date accounts in the CSGL account.
- (xxi) He shall approve all vouchers prepared and certify the correctness of the statements, reports and returns to be submitted to various quarters by the Bank.

Investment Committee

An Investment Committee comprising the following Officers of the Bank shall monitor and review the functioning of the Treasury Management on a monthly basis or more frequent intervals as may be decided by the Managing Committee from time to time and approve the loss if any incurred through any of the individual transactions enter into by the Treasury Management.

(i)	Chief Executive Officer	Chairman
(ii)	Assistant General Manager (Development)	Member
(iii)	Assistant General Manager (Estt. & Loan)	Member
(iv)	Assistant General Manager (Funds & Account)	Member
(,		Mambar Cons

(v) Chief Investment Manager Member Convener

The investment Committee shall meet at least once in a month to take stock of the activities of the Investment Management Cell during the previous month and approve all deals. The Chief Investment Manager shall produce all the relevant records and an analytical note on the functioning of the IMC in the preceding month before the Investment Committee.



Audit control.

The Internal Audit of accounts of TMC shall be entrusted to a Chartered Accountant whose fees shall be decided by the Chief Investment Manager. The CA will be responsible for checking the books of accounts of TMC as per the approved rules, guidelines of RBI/NABARD and adherence to the investment policy in the day to day functioning of the TMC. A quarterly Audit Report shall be submitted to the Chief Executive Officer. In turn, the Audit Report along with the compliance, if any, shall be placed before the Committee of Management at half-yearly intervals for onward transmission to RBI/NABARD by 15th May and 1st November.

CHIEF EXECUTIVE OFFICER
Chief EXECUTIVE OFFICER
Chief EXECUTIVE OFFICER
Sundargarh OCOBBANK LTD.
Sundargarh DARGARH

Collector & District Magistrate, Sundargarh-Sundargarh Dist. Central Co-operative Bank Ltd., Sundargarh