

# Mandala Capital Limited

## Procurement Process

**Adopted by the Board of Directors on 26 May 2025.**

### Objective:

This procurement process aims to ensure transparency, value for money, and internal compliance while managing risks and supporting ethical sourcing. It promotes efficient resource use, competitive bidding, and strong conflict-of-interest controls. The process also emphasizes thorough documentation and alignment with the investment managers and the fund's broader investment strategy and ESG principles, ultimately safeguarding investor interests and enhancing operational effectiveness.

### Scope:

This process is applicable for all the procurement of goods/services done by Mandala Capital Limited and the Funds (including Special Purpose Vehicles) under its management. All the procurement of the Funds (including Special Purpose Vehicles), will be handled by Mandala Capital Limited following this procurement process.

### Process:

#### 1. Needs Identification and Requisition

- Business units identify the need for goods/services (e.g. legal, audit, IT, consultation, due diligence, providers).
- A requisition based on discussion, email exchanges etc is raised internally with justification.
- Budget alignment is checked.

#### 2. Vendor Selection and Due Diligence

- Prequalified vendors are shortlisted, or new vendors are identified.
- Due diligence is conducted (KYC, AML, conflict of interest check, prior performance).
- For critical or high-value procurements of USD 50,000 and above in the same fiscal year from a single vendor, at least **two to three quotes** are obtained (unless sole-sourcing is justified for specific jobs or unavailability of vendors).

#### 3. Evaluation and Approval

- Proposals are evaluated based on price, quality, experience, compliance and reviews, (if available).

- Selection methods include Quality Cost Based Selection (QCBS), Quality Based Selection (QBS), Fixed Budget Selection (FBS), Least Cost Selection (LCS), Consultants Qualifications Selection (CQS), Single source selection (SSS).
- Evaluation and negotiation are conducted by the **team** or designated approvers.
- Approval from as per following matrix is taken.

S. No.	Approving Authority	Value threshold in USD
1	Joint approval of COO and CFO	Less than 10,000
2	Any Director severally	10,000 to 50,000
3	Board of Mandala Capital Limited	More than 50,000

*\*Exceptionally an urgent/immediate procurement of USD 50,000 or more with approval of Director will do, which shall be subsequently ratified by the Board of Mandala Capital Limited in the next Board Meeting.*

#### 4. Contracting

- Team shall do a review contract or engagement letter.
- A service agreement or engagement letter is executed with clearly defined deliverables, payment terms, and termination clauses.

#### 5. Engagement Confirmation

- A formal engagement confirmation is issued. This serves as the internal authorization to proceed with the procurement.

#### 6. Delivery of Service / Performance Monitoring

- Vendor delivers goods/services as per contract.
- Performance is monitored by service receiving team, especially for recurring or strategic suppliers.

#### 7. Invoice Verification & Payment

- Invoices are verified against ELs, contracts, and proof of delivery.
- Payment follows a **maker-checker-joint approver** process, ensuring control.

#### 8. Record Keeping and Audit Trail

- All procurement records (contracts, approvals, invoices) are retained for audit purposes.



- Documentation is securely stored in compliance with regulatory and internal policy requirements.

**9. Post-Engagement Review (if applicable)**

- For major contracts (value > USD 100,000), a post-engagement review may be conducted to assess performance and inform future procurement decisions.