





Risk Management Policy

Table of Content

Contents

INTRODUCTION	3
OBJECTIVE	3
PROCESS AND PROCEDURE	3
RISK MANAGEMENT COMMITTEE	4
ROLE OF RISK MANAGEMENT COMMITTEE	4
AMENDMENT IN LAW	5
Annexure 'A'	6

INTRODUCTION

As per the Regulation 17(9)(a)&(b) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the listed entity shall lay down procedures to inform members of board of directors about risk assessment and minimization procedures. The board of directors shall be responsible for framing, implementing and monitoring the risk management plan for the listed entity.

Section 134(3)(n) of the Companies Act, 2013 ("Act") states that there shall be attached to statements (i.e. financial statements) laid before a company in general meeting, a report by its Board of Directors, which shall include - "a statement indicating development and implementation of a risk management policy for the company including identification therein of elements of risk, if any, which in the opinion of the Board may threaten the existence of the company".

OBJECTIVE

The objective of this Policy is to manage the risks involved in all activities of the Company to maximize opportunities and minimize adversity. This Policy is intended to assist in decision making processes that will minimize potential losses, improve the management of uncertainty and the approach to new opportunities, thereby helping the Company to achieve its objectives.

The key objectives of this Policy are:

- (a) Safeguarding the Company's property and interest of all stakeholders.
- (b) Laying down of a framework for identification, measurement, evaluation, mitigation and reporting of various risks.
- (c) Evolving the culture, processes and structures that are directed towards the effective management of potential opportunities and adverse effects, which the business and operations of the Company are exposed to.
- (d) Balancing between the cost of managing risk and the anticipated benefits.
- (e) To create awareness among the employees to assess risks on a continuous basis and develop risk mitigation plans in the interest of the Company.
- (f) Provide a system for setting of priorities when there are competing demands on limited resources.

PROCESS AND PROCEDURE

The risk management process consists of the following main elements:

Identify	:	Identify a risk and document the risks captured by the risk register owner.
Assess	:	The primary goal is to document the net effect of all identified risks, by assessing: • Likelihood of risks; • Impact of each risk; • Proximity of risk; and • Prioritisation based on scales.
Plan	:	Preparation of management responses to mitigate the risks.

Implement	:	Risk responses are actioned.
Monitor and review	:	Monitor and review the performance of the risk management system and changes to business initiatives.
Communicate	:	Provide regular reports to Audit Committee / Risk Management Committee / Board at regular intervals

Risk Management Committee to meet at regular intervals to discuss and review the various risks and its mitigation plans (“Report”) by the concerned departments. The Report defines the Owner of the Risk against the identified risk, level of risk (High, Moderate, Low), steps / measures taken / to be taken to mitigate/minimize the risk and level of risk after taking such actions. The said Report is submitted to the Audit Committee / Board for their review and discussion.

RISK MANAGEMENT COMMITTEE

Pursuant to the provisions of Regulation 21 of the Listing Regulations, the Board of Directors at its Meeting shall constitute the Risk Management Committee of Directors comprising of members as required under applicable rules and regulation.

The Risk Management Committee of Directors shall review and monitor the various risks concerning the Company and its mitigation plan and such other functions as required under the Listing Regulations or other applicable laws, as amended from time to time.

The Risk Management Committee shall meet at least twice in a financial year in such a manner that on a continuous basis not more than two hundred and ten days shall elapse between any two consecutive meetings.

The quorum for the Risk Management Committee shall be either two members or one third of the members of the Committee, whichever is higher, including at least one independent director.

Risk Management Committee identified various risks which is enclosed herewith as Annexure – ‘A’

ROLE OF RISK MANAGEMENT COMMITTEE

The role of the Risk Management Committee shall, inter alia, include the following:

- 1) To formulate a detailed risk management policy which shall include:
 - (a) A framework for identification of internal and external risks specifically faced by the Company, in particular including financial, operational, sectoral, sustainability (i.e. Environment, Social & Governance (ESG) related risks), information, cyber security risks or any other risk as may be determined by the Committee;
 - (b) Measures for risk mitigation including systems and processes for internal control of identified risks;
 - (c) Business continuity plan.
- 2) To ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company;

Risk Management Policy

- 3) To monitor and oversee implementation of the risk management policy, including evaluating the adequacy of risk management systems;
- 4) To periodically review the risk management policy, at least once in two years, including considering the changing industry dynamics and evolving complexity;
- 5) To keep the board of directors informed about the nature and content of its discussions, recommendations and actions to be taken;
- 6) The appointment, removal and terms of remuneration of the Chief Risk Officer (if any) shall be subject to review by the Risk Management Committee.

The Risk Management Committee shall coordinate its activities with other committees, in instances where there is any overlap with activities of such committees, as per the framework laid down by the Board of Directors.

The Risk Management Committee has responsibility to review and report to the Board that:

- (a) the Committee has, at least once in two years, reviewed the risk management policy / framework to satisfy itself that all potential risks are identified;
- (b) risk management plan / processes have been designed properly and implemented effectively to manage the identified risks;
- (c) such risk management plan / processes are reviewed and monitored regularly;
- (d) proper remedial action is undertaken to redress areas of potential risk.
- (e) Review various options to deal with risk such as tolerate, transfer or terminate.

AMENDMENT IN LAW

Any subsequent amendment / modification in the Listing Regulations / Act in this regard shall automatically apply to this Policy. The same shall be added/amended/ modified from time to time by the Board of Directors of the Company with due procedure.

Annexure 'A'

PLANT	MARKETING	PROJECT	PROCUREMENT RISK
<ul style="list-style-type: none"> ✓ Availability of Power ✓ Storage and handling ✓ Pollution ✓ Contamination of FGs (within factory) ✓ Statutory compliances related to plant ✓ Plant obsolete (wear and tear) ✓ Process Oriented Risk 	<ul style="list-style-type: none"> ✓ Demand forecast ✓ Volatility in pricing of some Products ✓ Dealers ✓ Export and Import of some goods and materials ✓ Logistics ✓ Credit Risks (receivables) ✓ Over Dependence on few key customers ✓ Political/Country Risk 	<ul style="list-style-type: none"> ✓ Cost (inflation, exchange fluctuation, delay) ✓ Time ✓ deliverables (outdated technology, failure to produce required output, environment and other market factors) 	<ul style="list-style-type: none"> ✓ Limited vendors for certain raw materials ✓ Inventory Management ✓ Procurement of quality raw material at budgeted price and on timely manner
FINANCE	HUMAN RESOURCE	IT	
<ul style="list-style-type: none"> ✓ Fixed Cost ✓ Exchange risk on foreign currency borrowings ✓ Increased cost of borrowings ✓ High level of inventory (blockage of working capital) ✓ Regulatory risks relating to tax, audit and governance compliances and changes in government policies relating thereto ✓ Unbalanced borrowing programmes for funding future projects ✓ Fraud ✓ Treasury operations ✓ Volatile insurance cost 	<ul style="list-style-type: none"> ✓ Litigation risks related to manpower, contract labour etc. ✓ Strikes, lockouts ✓ Statutory Compliances ✓ Change in Government Policies on labour reforms ✓ Over / Under sizing of manpower 	<ul style="list-style-type: none"> ✓ Cyber Security Risk 	
