OSWAL EXTRUSION LIMITED

[CIN:U25200GJ2004PLC045239]

RISK MANAGEMENT POLICY

1. LEGAL FRAMEWORK:

Oswal Extrusion Limited **("the Company")** is one of the Company engaged in manufacturing and trading of all kinds of plastic products and materials. A number of practices and forms are adopted by the Management while taking decisions and monitoring performance, including functional and business review, which address current performance and future direction and changes thereto, as well as addressing potential risks. As a part of strengthening and institutionalizing the decision making process and monitoring the exposures that are faced by the Company, a formalized Risk Management System is being implemented on the Company.

Managing Risk is a skill that is sought to be strengthened through this process and an effort at making decision making more consistent in a way that the business objectives are met most of the times. The Risk Management process seeks to provide greater confidence to the decision maker and thus enhance achievement of Objectives.

As a part of the Corporate Governance requirements under the Companies Act, 2013 it is required to frame Risk Management Policy of Companies.

Risk Management is a key aspect of the "Corporate Governance Principles and Code of Conduct" which aims to improvise the governance practices across the Company's activities.

Risk management policy and processes will enable the Company to proactively manage uncertainty and changes in the internal and external environment to limit negative impacts and capitalize on opportunities.

Risk Management' is the identification, assessment, and prioritization of risks followed by coordinated and economical application of resources to minimize, monitor, and control the probability and/or impact of uncertain events or to maximize the realisation of opportunities.

Risk management also provides a system for the setting of priorities when there are competing demands on limited resources.

This document outlines the Charter – the purpose, authority and responsibility and the Policy as related to Risk Management.

2. APPLICABILITY:

This policy applies to the company and all their functions and departments.

3. COMPONENTS OF A SOUND RISK MANAGEMENT SYSTEM:

The risk management system at the Company has the following key features:

- Active board and senior management oversight
- Appropriate policies, procedures and limits
- Comprehensive and timely identification, measurement, mitigation, controlling, monitoring and reporting of risks
- Appropriate management information systems (MIS) at the business level
- Comprehensive internal controls in accordance with current regulations
- A Risk Culture and communication

4. DEFINITIONS:

Risk:

Risk is often described by an event, a change in circumstances or a consequence that may occur, and whose occurrence, if it does take place, has a harmful or negative impact on the achievement of the organization's business objectives. Thus, risk is the effect of uncertainty on objectives.

Risk Management:

The co-ordinated activities to direct and control an organisation with regard to risk. The systematic process of identifying, analysing, and responding to anticipated future events that have the potential to impact objectives.

Risk Management Policy:

Risk Management Policy is a statement of the overall intentions and direction of an organization related to Risk Management.

Risk Management Framework:

Risk Management Framework is a set of components that provide the foundations and organizational arrangements for designing, implementing, monitoring, reviewing and continually improving Risk Management throughout the organization.

Risk Management Plan:

Risk Management Plan is a scheme or an operation plan within the Risk Management Framework specifying the approach, management components and resources to be applied to management of risk.

Risk Strategy:

The Risk Strategy of an organization defines its readiness towards dealing with various risks associated with the business. It describes the organization's risk appetite or tolerance levels and decision to transfer, reduce or retain the risks associated with the business.

Risk Owner:

Risk Owner is a person or entity with the accountability and authority to manage risk.

Risk Analysis:

The process of determining how often specified events may occur (likelihood) and the magnitude of their consequences (impact).

Likelihood:

Likelihood means the chance of something happening; whether defined, measured or determined objectively or subjectively, qualitatively or quantitatively and described using general terms or mathematically such as a probability or a frequency over a given time Period.

Risk Evaluation:

The process of determining Risk Management priorities by comparing the level of risk against

predetermined standards, target risk levels or other criteria, to generate a prioritized list of risk for further monitoring and management.

Risk Assessment:

Risk assessment is the combined process of Risk Analysis and Risk Evaluation.

Risk Source:

Risk Source is an element which alone or in combination has the intrinsic potential to give rise to risk.

Risk Description:

A Risk Description is a comprehensive template covering a range of information about a particular risk that may need to be recorded in a structured manner.

Risk Profile:

Risk Profile is a description of any set of risks that may relate to the whole or part of the organization or as otherwise defined.

Risk Criteria:

Risk Criteria is a terms of reference against which the significance of a risk is evaluated. They are based on organizational objectives and external or internal context and can be derived from standards, laws, policies and other requirements.

Risk Treatment:

Risk Treatment is a process to modify a Risk. It that deals with negative consequences is also referred to as 'Risk Mitigation', 'Risk Elimination', 'Risk Prevention' and 'Risk Reduction'. It can create new risks or modify existing Risks.

Control:

Control is a measure of modifying risk and includes any process, policy, device, practice or other actions which modify risk. It may not always apply the intended or assumed modifying effect.

"Board of Directors" or **"Board"** in relation to a Company, means the collective body of Directors of the Company. (Section 2(10) of the Companies Act, 2013)

5. OBJECTIVE & PURPOSE OF POLICY:

The main objective of this policy is to ensure sustainable business growth with stability and to promote a proactive approach in reporting, evaluating and resolving risks associated with the business. In order to achieve the key objective, the policy establishes a structured and disciplined approach to Risk Maxnagement, in order to guide decisions on risk related issues.

The specific objectives of the Risk Management Policy are:

1. To ensure that all the current and future material risk exposures of the company are identified, assessed, quantified, appropriately mitigated, minimized and managed i.e. to ensure adequate systems for risk management.

2. To establish a framework for the company's risk management process and to ensure its implementation.

3. To enable compliance with appropriate regulations, wherever applicable, through the adoption of best practices.

4. To assure business growth with financial stability.

6. ROLES AND RESPONSIBILITIES:

i) Board:

The Company's risk management architecture is overseen by the Board of Directors (BOD) and policies to manage risks are approved by the Board Ensure that the organization has proper risk management framework

- Define the risk strategy and risk appetite for the company
- Approve various risk management policies including the code of conduct and ethics
- Ensure that senior management takes necessary steps to identify, measure, monitor and control these risks
- evaluates information security and associated risk exposures
- evaluates regulatory compliance program
- evaluates the organization's readiness in case of business interruption
- engages in continuous education and staff development
- provides support to the company's anti-fraud programs

ii) Audit Committee:

The Audit Committee assists the Board in carrying out its oversight responsibilities relating to the Company's (a) financial reporting process and disclosure of financial information in financial statements and other reporting practices, b) internal control, and c) compliance with laws, regulations, and ethics (d) financial and risk management policies.

- Setting policies on internal control based on the organisation's risk profile, its ability to manage the risks identified and the cost/ benefit of related controls;
- Seeking regular assurance that the system of internal control is effective in managing risks in accordance with the Board's policies.
- Ensure that senior management monitors the effectiveness of internal control system
- Help in identifying risk, assessing the risk, policies / guidance notes to respond its risks and thereafter frame policies for control and monitoring.

iii) Risk Management Function:

The Risk Management Division is the key division which would implement and coordinate the risk function as outlined in this policy on an ongoing basis. It would act as the central resource division for administration of Risk management Function.

- Developing and communicating organizational policy and information about the risk management program to all staff, and where appropriate to our associates /suppliers / contractors etc.;
- Develop, enhance and implement appropriate risk management policies, procedures and systems
- Work with risk owners to ensure that the risk management processes are implemented in accordance with agreed risk management policy and strategy
- Review risks and risk ratings of each department
- Provide advice and tools to staff, management, the Executive and Board on risk management issues within the organisation, including facilitating workshops in risk Identification
- Oversee and update organisational-wide risk profiles, with input from risk owners

iv) Business Units:

- Comply with Company standards which relate to particular types of risks;

- Manage the risk they have accountability for
- Review the risk on a regular basis
- Identify where current control deficiencies may exist;

7. DISCLOSURE IN BOARD'S REPORT:

Board of Directors 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.

8. REVIEW:

This policy shall be reviewed at a minimum at least every year to ensure it meets the requirements of legislation & the needs probable risk of organization.

9. AMENDMENT:

This Policy can be modified at any time by the Board of Directors of the Company.