

SWASTIKA CASTAL LTD

Risk Management Policy

Objective

Swastika Castal Ltd ("the Company") considers ongoing risk management to be a core component of its management framework. The Company understands that its ability to identify and address risks is of utmost importance in achieving its corporate objectives.

The Company's Risk Management Policy ("the Policy") outlines the program implemented by the Company to ensure appropriate risk management within its systems and culture. The Policy is formulated in compliance with Regulation 17(9)(b) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations") and the provisions of the Companies Act, 2013 ("the Act"), which require the Company to lay down procedures regarding risk assessment and risk minimization.

RISK MANAGEMENT COMMITTEE

- The Risk Management Policy will be channelized through a Risk Management Committee ("the Committee"), which shall be responsible for strategizing the policy and providing periodic feedback to the Board towards the implementation of the Risk Management Policy.
- The Committee will keep insight into the requirements of sound corporate governance oversight and review periodic reports from identified full-time executives in relevant areas.
- The Committee shall be constituted by the Board of Directors comprising three members, with a majority of them being members of the Board of Directors, including at least one independent director. The Chairperson of the Risk Management Committee shall be a member of the Board of Directors, and senior executives of the Company may be members of the Committee.
- The Committee will have the oversight of the Risk Management delivery framework of the Company.
- The role of the Committee shall include the terms of reference in accordance with the Listing Regulations.

Primary Objectives of the Risk Management Policy

- Identification and categorization of potential risks.
- Assessment and mitigation of risks.
- To monitor and assure continuous growth and sustain market leadership in the mobility industry, both domestically and globally.

Works / Factory

Block No. 535, Vemardi Road
Vill: Kandari, Tal: Karjan
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Key Areas/Risks Covered by the Risk Management Policy

1. Technology Risks

- Swastika Castal Ltd. is committed to embracing new technologies to deliver superior products and solutions to its customers and stakeholders. The primary risk it monitors is the adoption of new technology or the risk of being left behind in an era of evolving technologies.
- IT and digitalization are key enablers for delivering end-to-end mobility solutions. Risks associated with disaster preparedness, data security, information privacy, legal compliance, etc., are key areas to be addressed.
- The company mitigates technology risks through continuous R&D initiatives, staying updated with global changes, promoting entrepreneurial skills among personnel, and developing in-house solutions or procuring them.

2. Financial Risks

- Financial risks relate to adequate liquidity for routine operations and the availability of funds for expansions, as well as impacts from currency fluctuations, changes in credit ratings, etc.
- The Company should closely monitor the financial performance of subsidiaries, associates, and affiliates, as well as its investments. Investment decisions should be based on financial modeling and currency fluctuations should be regularly examined.

3. Economic Environment Risks

- Changing economic policies may impact the Company's strategies and performance. A mismatch in demand and supply, as well as competitive products, may influence the Company's market share.
- The Company must closely monitor new policies and changes in existing ones and adapt accordingly.

4. Operational Risks

- Manufacturing defects, labor unrest, injuries, accidents, or suspended operations at a plant may impact the Company's operations.

5. Commodity Risks

- Risks related to raw material prices, commodity price fluctuations, and crude oil prices are significant business and operational risks.
- The Company works continuously on cost reduction, weight reduction, and process improvement initiatives. Additionally, it considers local sourcing or global sourcing to minimize costs in procuring parts and raw materials.

6. Regulatory Risks

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- Non-compliance with applicable laws may result in liabilities and damage to the Company's reputation.
- Frequent changes in emission norms require the Company to stay prepared and update its products in line with the applicable standards. The Company ensures there is no non-compliance with any applicable laws and actively monitors and complies with evolving emission norms and environmental regulations.

7. Human Resource Risks

- The Company recognizes the importance of its employees. Initiatives should be undertaken to ensure there is a robust plan for succession and retention of key personnel.
- Talent in key areas and new businesses should be sourced from external partners or through internal employee referral schemes. The Company ensures that its employees are regularly trained and updated to contribute to the organization's growth.

8. Market Risks

- Market risks broadly include risks related to pricing, product development, promotion, distribution, branding, customer experience, and customer base.
- The Company is committed to identifying, analyzing, and quantifying market risks, as well as developing strategies and appropriate policies to manage market risk.

Mitigation Strategies

To ensure that the above risks are mitigated, the Company will strive to:

- Involve all functions in the overall risk identification and mitigation process.
- Develop an objective framework to categorize risks and define the level at which each risk should be addressed.
- Link the risk management process to strategic planning and the internal audit process.
- Promote a culture of calculated risk-taking and thoughtful risk mitigation.
- Formalize a transparent risk information system across the organization with structured templates.

MEETING AND QUORUM

- The Risk Management Committee shall meet at least twice a year.

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- The quorum for a meeting of 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 member of the Board of Directors in attendance.
- The meetings of the Risk Management Committee shall be conducted such that no more than one hundred and eighty days elapse between any two consecutive meetings.

REVIEW AND AMENDMENTS

- The Risk Management Policy should be reviewed periodically by the Board of Directors.
- The provisions of this policy may be modified by the Board on the recommendation of the Committee from time to time in line with the listing regulations as and when required or otherwise.
- In case of any amendment(s), clarification(s), circular(s), etc., issued by the relevant authorities that are inconsistent with this policy, the provisions of such amendment(s), clarification(s), or circular(s) shall prevail, and the policy shall be amended accordingly from the effective date of such changes.

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