ARJUN JEWELLERS LIMITED

CIN: U36100GJ2020PLC111829

RISK MANAGEMENT POLICY

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Background

Arjun Jewellers Limited (the "**Company**") considers ongoing risk management to be a core component of the Management of the Company and understands that the Company's ability to identify and address risk is central to achieving its corporate objectives.

This Risk Management Policy (the "**Policy**") outlines the program implemented by the Company to ensure appropriate risk management within its systems and culture and is meant to ensure continuity of business and protection of interests of the investors and thus covers all the activities within the Company and events outside the Company which have a bearing on the Company's business.

Regulation 17(9)(a) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**"), inter alia, mandates laying down the procedures for risk assessment and minimization. Further Regulation 17(9)(b) of the Listing Regulations, provides that the Board of Directors shall be responsible for framing, implementing and monitoring the risk management plan for the company. Regulation 21(4) further provides that the board of directors shall define the role and responsibility of the Risk Management Committee and may delegate monitoring and reviewing of the risk management plan to the committee and such other functions as it may deem fit. Such functions shall specifically cover cyber security. It further states that the role and responsibilities of the Risk Management Committee shall mandatorily include the performance of functions specified in Part D of Schedule II. (**Annexure 1**)

The formulation of this Policy is in compliance with Regulation 17(9) and Regulation 21 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") and Section 134 (3)(n) of the Companies Act, 2013. Section 177(4)(vii) of the Companies Act, 2013 provides that the Audit Committee shall evaluate the internal financial controls and risk management systems of the company.

Objective and Purpose

In line with the Company's objective towards increasing stakeholder value, a risk management policy has been framed, which attempts to identify the key events / risks impacting the business objectives of the Company and attempts to develop risk policies and strategies to ensure timely evaluation, reporting and monitoring of key business risks. These include:

a. Providing a framework, that enables future activities in a consistent and controlled manner;
b. Improving decision making, planning and prioritization by comprehensive and structured understanding of business activities, volatility and opportunities/ threats;
c. Contributing towards more efficient use/ allocation of the resources within the organization;
d. Protecting and enhancing assets and Company's image;
e. Reducing volatility in various areas of the business;
f. Developing and supporting people and knowledge base of the organization;
g. Optimizing operational efficiency; and
h. Effectively implement and maintain the business continuity plan in all possible adverse situations.

'**Risk**' in literal terms can be defined as the effect of uncertainty on the objectives. Risk is measured in terms of consequences and likelihood. Risks can be internal and external and are inherent in all administrative and business activities. Every member of any organisation continuously manages various types of risks. Formal and systematic approaches to managing risks have evolved and they are now regarded as good management practice also called as Risk Management.

'**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.

Effective Risk Management requires:
a. A strategic focus,

b. Forward thinking and active approaches to management
c. Balance between the cost of managing risk and the anticipated benefits, and
d. Contingency planning in the event that critical threats are realised.

'senior management' shall mean the officers and personnel of the listed entity who are members of its core management team, excluding the Board of Directors, and shall also comprise all the members of the management one level below the Chief Executive Officer or Managing Director or Whole Time Director or Manager (including Chief Executive Officer and Manager, in case they are not part of the Board of Directors) and shall specifically include the functional heads, by whatever name called and the persons identified and designated as key managerial personnel, other than the board of directors, by the listed entity.

Policy

Risk is the potential for failure or loss of value or the missed opportunity for value creation / strategic competitive advantage resulting from either a certain action or a certain inaction.

Controlling risk is essential in any business by having processes to ensure safeguarding of assets and compliance with appropriate regulatory frameworks. However, risks may also have to be taken consciously to explore untapped business opportunities in line with the corporate strategy to optimize maximum potential stakeholder's value and to improve their confidence.

Our risk management approach is composed primarily of three components:
a. Risk Governance
b. Risk Identification
c. Risk Assessment and Control

Risk Governance

i. The functional heads of the Company are responsible for managing risk on various parameters and ensure implementation of appropriate risk mitigation measures.
ii. The Risk Management Committee provides oversight and reviews the risk management policy from time to time.

Risk Identification

External and internal risk factors that must be managed are identified in the context of business objectives.

Risk identification forms the core of the Risk Management system. Multiple approaches for Risk identification are applied to ensure a comprehensive Risk Identification process.

The company identifies sources of Risk, areas of impacts, events and their causes with potential consequences. Key Risks on which the Company presently focuses can be broadly subdivided into Internal and External Risks and may comprise of the following:

INTERNAL RISKS:

- Technological risk
- Financial risks
- Operational risks
- Strategic business risks
- Legal and regulatory compliance risks
- Cyber security risks
- Cost risks

EXTERNAL RISKS:

- Economic Environment and Market conditions Risks

- Competition risks:
- Government policy, political and sectorial risks
- Risk related to intellectual property rights;
- Sustainability (ESG) risks

Disruptive risks:

These are the anticipated or unanticipated events which may result in disruption of the operations of the firm or existence of its current business model, and innovations to business models that disrupt the existing paradigm

Risk Assessment and Control:

This comprises the following:

a) Risk assessment and reporting
b) Risk control
c) Capability development

On a periodic basis risk, external and internal risk factors are assessed by responsible managers across the organization. The risks are identified and formally reported through mechanisms such as operation reviews and committee meetings. Internal control is exercised through policies and systems to ensure timely availability of information that facilitate pro-active risk management. Examples of certain of these identified risks are as follows:

i. Broad market trends and other factors beyond the Company's control significantly reducing demand for its services and harming its business, financial condition and results of operations
ii. Failure in implementing its current and future strategic plans
iii. Significant and rapid technological change
iv. Damage to its reputation
v. Its products losing market appeal and the Company not being able to expand into new product lines or attracting new types of investors
vi. Its risk management methods and insurance policies not being effective or adequate
vii. Fluctuations in trading activities
viii. Changes in interest rates
ix. Changes in government policies
x. Security risks and cyber-attacks
xi. Insufficient systems capacity and system failures

RISK MITIGATION

Risk treatment involves selecting one or more options for modifying risks and implementing those options. Once implemented, treatments provide or modify the controls.

Risk treatment involves a cyclical process of:

- Assessing a risk treatment;
- Deciding whether residual risk levels are tolerable;
- If not tolerable, generating a new risk treatment; and
- Assessing the effectiveness of that treatment.

Based on the Risk level, the company should formulate its Risk Management Strategy. The strategy will broadly entail choosing among the various options for risk mitigation for each identified risk. Risk treatment options are not necessarily mutually exclusive or appropriate in all circumstances. The following framework shall be used for risk treatment:

1. Risk Avoidance (eliminate, withdraw from or not become involved)

Risk avoidance implies not starting or continuing with the activity that gives rise to the risk.

2. Risk Reduction (optimize - mitigate)

   Risk reduction or "optimization" involves reducing the severity of the loss or the likelihood of the loss from occurring. Acknowledging that risks can be positive or negative, optimizing risks means finding a balance between negative risk and the benefit of the operation or activity, and between risk reduction and the effort applied.

3. Risk Sharing (transfer - outsource or insure)

   Sharing, with another party, the burden of loss or the benefit of gain from a risk.

4. Risk Retention (accept and budget)

   Involves accepting the loss or benefit of gain, from a risk when it occurs. Risk retention is a viable strategy for risks where the cost of insuring against the risk would be greater over time than the total losses sustained. All risks that are not avoided or transferred are retained by default. This includes risks that are so large or catastrophic that they either cannot be insured against, or the premiums would be infeasible. This may also be acceptable if the chance of a very large loss is small or if the cost to insure for greater coverage amounts is so great it would hinder the goals of the organization too much.

RISK REPORTING

1. Periodically, key risks are reported to the Board or risk management committee with causes and mitigation actions undertaken/ proposed to be undertaken.
2. The internal auditor carries out reviews of the various systems of the Company using a risk-based audit methodology. The internal auditor is charged with the responsibility for completing the agreed program of independent reviews of the major risk areas and is responsible to the audit committee, which reviews the report of the internal auditors on a quarterly basis.
3. The statutory auditors carry out reviews of the Company's internal control systems to obtain reasonable assurance to state whether an adequate internal financial controls system was maintained and whether such internal financial controls system operated effectively in the company in all material respects with respect to financial reporting.
4. On a regular periodic basis, the Board will, on the advice of the audit committee, receive the certification provided by the CFO, on the effectiveness, in all material respects, of the risk management and internal control system in relation to material business risks.
5. The Board shall include a statement indicating development and implementation of a risk management policy for the Company, including identification of elements of risk, if any, which in the opinion of the Board may threaten the existence of the Company.

Risk Management Committee

The Company has a committee of the Board, namely, the Risk Management Committee, which was constituted with the overall responsibility of overseeing and reviewing risk management across the Company.

The terms of reference of the Risk Management Committee are as follows:

- Formulation of a detailed risk management policy which shall include: (a) a framework for identification of internal and external risks specifically faced by the listed entity, in particular including financial, operational, sectoral, sustainability (particularly, ESG related risks), information, cyber security risks or any other risk as may be determined by the Risk Management Committee; (b) measures for risk mitigation including systems and processes for internal control of identified risks; and (c) business continuity plan;

- Ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company;

- Monitor and oversee implementation of the risk management policy, including evaluating the adequacy of risk management systems;

- Periodically review the risk management policy, at least once in two years, including by considering the changing industry dynamics and evolving complexity, and recommend for any amendment or modification thereof, as necessary;

- Keep the Board of directors of the Company informed about the nature and content of its discussions, recommendations and actions to be taken;

- Review the appointment, removal and terms of remuneration of the chief risk officer (if any);

- To implement and monitor policies and/or processes for ensuring cyber security; and

- Any other similar or other functions as may be laid down by Board from time to time and/or as may be required under applicable law, as and when amended from time to time, including the SEBI Listing Regulations.

Composition, Quorum and Meetings of Risk Management Committee

The requirements in relation to composition, quorum and meetings of Risk Management Committee shall be as per the requirements of SEBI Listing Regulations and Section 134 of the Companies Act, 2013.

Amendments

Any change in the Policy shall be approved by the Board of Directors or any of its Committees (as may be authorized by the Board of Directors in this regard). The Board of Directors or any of its authorized Committees shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board or its Committee in this respect shall be final and binding. Any subsequent amendment / modification in the SEBI Listing Regulations and / or any other laws in this regard shall automatically apply to this Policy.

Communication of this Policy

The Policy shall be posted on the website of the Company at https://arjunjewellers.in/ or any modification thereof

Version History

Version	Approved By	Approval Date	Effective Date
1st Version	Board of Directors	18.08.2025	18.08.2025