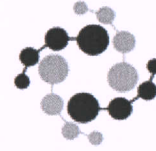


# Steelman Telecom Limited

(Formerly Known as Steelman Telecom Private Limited)



## RISK MANAGEMENT POLICY

### 1. Introduction

Risk management is an integral component of good corporate governance and fundamental in achieving the company's strategic and operational objectives. It improves decision-making, defines opportunities and mitigates material events that may impact shareholder value. Steelman Telecom Limited desires to refine its organizational wide capabilities in risk management so as to ensure a consistent, efficient and effective assessment of risks in the achievement of the organization's objectives. It views risk management as integral to its objective of creating and maintaining business continuity, shareholder value and successful execution of its strategies. The Company's risk management policy provides the framework to manage the risks associated with its activities. It is designed to identify, assess, monitor and manage risk.

### 2. Objectives

The Risk Management Policy forms an integral part of the internal control and corporate governance framework of Steelman Telecom Limited. The Company's Risk Management Policy endeavours to support its objectives among others by –

- i) Ensuring sustainable business growth with stability and promoting a pro-active approach in reporting, evaluating and resolving risks associated with the business.
- ii) Providing a framework that enables future activities to take place in a consistent and controlled manner.
- iii) Improving decision making, planning and prioritization by comprehensive and structured understanding of business activities, volatility and opportunities/ threats.
- iv) Evaluating the likelihood and impact of major adverse events;
- v) Developing responses to either prevent such events from occurring or manage and minimise the impact of such event, if it does occur;
- vi) Identifying any unmitigated risks and formulating action plans for addressing such risks;
- vii) Compliance with provisions of relevant legislations The Company strongly believes that Risk Management implementation should be in spirit and not only in form.

### 3. Statutory Requirements

The Companies Act 2013 and SEBI Regulations have placed additional responsibilities on the Board of Directors and Management to have structured Enterprise-wide Risk Management which is reviewed and reported periodically including;



# Steelman Telecom Limited



*(Formerly Known as Steelman Telecom Private Limited)*

- i) The Board of Directors' report must 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.
- ii) The Audit Committee shall act in accordance with the terms of reference specified in writing by the board, which shall, inter alia, include evaluation of risk management systems.
- iii) Independent directors should satisfy themselves that systems of risk management are robust and defensible. The Board of the Company is responsible for overseeing the establishment and implementation by management of risk management systems and reviewing the effectiveness of these systems.

#### **4. Who the policy applies to**

This policy shall apply across all locations of the company including its operations and all support functions.

#### **5. Roles and Responsibilities**

Approve and review the Risk Management Policy

- i) Define the Company's risk appetite.
- ii) Identify and assess internal and external risks in particular including financial, operational, sectoral, sustainability of projects, information, cyber security risks or any other risk that may impact the Company in achieving its strategic objectives or may threaten the existence of the Company.
- iii) Monitoring and reviewing of the risk management plan by the Board of Directors and such other functions as it may deem fit;
- iv) Oversee the development and implementation of risk management framework and maintain an adequate monitoring and reporting mechanism.
- v) Formulate risk management strategy to manage and mitigate the identified risks.
- vi) Give directions to the Audit committee, project, operational and Finance team on top priority risks identified and its mitigation plan.

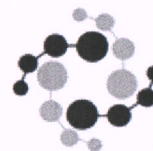
#### **6. Internal Audit:**

Further, the independent Internal Audit function shall provide assurance on the integrity and robustness of the risk management process.



# Steelman Telecom Limited

(Formerly Known as Steelman Telecom Private Limited)



## 7. Risk Management Process



- a) Risk Identification  
Risk identification involves consideration of the sources of risk, their consequences and the likelihood that those consequences may occur. The existing systems, control measures and procedures to control risk are identified and their effectiveness is assessed. The impact and likelihood of an event and its associated consequences are assessed in the context of the existing controls. Risk Identification is obligatory on all vertical and functional heads that with the inputs from their team members are required to report the material risks with their considered views and recommendations for risk mitigation. Analysis of all the risks thus identified shall be carried out through participation of the vertical/functional heads.
- b) Risk Assessment  
Risk evaluation involves comparing the level of risk found during the analysis process against the pre-defined risk weights so as to assess their potential severity of loss and to the probability of occurrence. Risk weights of High / Medium / Low can be assigned based on parameters for each operating activity. The output of the risk evaluation is a prioritized list of risks for further action. If the resulting risks fall into the low or acceptable risk categories they may be accepted with minimal further treatment.
- c) Control Risk  
Risk response involves identifying the range of options for treating risk, assessing those options, preparing risk treatment plans and implementing them. Options include avoiding the risk, reducing the likelihood of the occurrence, reducing the consequences, transferring the risk, and retaining the risk. Risks will be continuously monitored and reviewed; and the effectiveness of the controls in place and of the risk action plans is assessed to ensure changing circumstances do not alter risk priorities. Reporting should provide assurance to the Audit Committee and management with regards to the financial records, risk management and internal compliance.



# Steelman Telecom Limited

*(Formerly Known as Steelman Telecom Private Limited)*



## d) Policy Review

This policy shall be reviewed periodically, at least once in two years, including by considering the changing industry dynamics and evolving complexity to ensure effectiveness and that its continued application and relevance to the business. Feedback on the implementation and the effectiveness of the policy will be obtained from the risk reporting process, internal audits and other available information.

## D) Entry into Force

This revised policy formally enters into force with immediate effect after approval by The Board of Directors of the company as on date 14.02.2023.

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