



RISK MANAGEMENT POLICY

SAZGAR ENGINEERING WORKS LIMITED

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1. INTRODUCTION

1.1 Purpose of the Policy

All activities undertaken by Sazgar Engineering Works Limited (the Company) carry an element of risk. The exposure to these risks is managed through the practice of Risk Management. In managing risk, it is the Company's practice to take advantage of potential opportunities while managing potential adverse effects.

This policy outlines the Company's risk management process and sets out the responsibilities of the Board, Risk management Committee, Sustainability Committee, Chief Executive Officer, Risk owners, general responsibilities and Internal audit within the Company in relation to risk management.

1.2 Policy owner

The Risk management Committee is the owner of the Risk Management Policy.

2. DEFINITION

Risk – Risk is the chance of happening of an event that can prevent the Company from achieving its objectives.

Risk Management is "a process, affected by an entity's board of directors, management and other personnel, applied in strategy-setting and across the entity, designed to identify potential events that may affect the entity, and manage risk to be within its risk appetite, to provide reasonable assurance regarding the achievement of entity objectives."

Risk Owners - The individuals who are accountable to manage the risks in their area of responsibility.

3. POLICY STATEMENT

The Company is committed to develop a risk management culture, where risk management is seen as integral to the achievement of the Company's objectives at all levels and where the management is alert to risks, capable and confident to report the risks perceived to be important to the Company's priorities.

4. RESPONSIBILITY

4.1 Board

The board of directors of the Company has the overall responsibility for the governance of risk by establishing risk management policies and procedures. The Board of the Company shall undertake at least annually, an overall review of business risks to ensure that the management maintains a sound system of risk identification, risk management and related systemic and internal controls to safeguard assets, resources, reputation and interest of the company and shareholders.

In addition, Board shall take appropriate measures to proactively understand and address the principal as well as emerging sustainability risks and opportunities relevant to the company and its business, including climate-related risks and opportunities, assess their potential financial and operational impacts and implement strategies for management and mitigation thereof.

4.2 Risk Management Committee

The Risk Management Committee shall carry out a review of effectiveness of risk management procedures. The main responsibilities of Risk Management Committee are as follows:

- Monitoring and review of all material controls (financial, operational, compliance);
- Review that the Risk mitigation measures are robust and integrity of financials is ensured;
- Monitoring the compliance with the Risk Management policy;
- Reporting to the Board on effectiveness of risk management system.

4.3 Sustainability Committee

The Sustainability Committee monitors and reviews the sustainability (including climate) related risks and opportunities relevant to the Company and reports to the Board on annual basis.

4.4 Chief Executive

The Chief Executive Officer has the responsibility to:

- Ensure that risks (including sustainability related risks) are effectively managed across the entire organization and to achieve this, the CEO is supported by the risk owners.
- Develop the risk culture; implement and monitor the compliance of the Risk Management policy approved by the Board.
- Maintain the risk register. *(CEO may nominate a person to develop & update the risk register only after the discussion).*
- Report to the Sustainability Committee on effective management of sustainability (including climate) related risk and opportunities.

- Report to the Board and Risk Management Committee on implementation of risk management system and on compliance with the risk management policy.

4.5 Risk Owners

The risk owners have the responsibility to:

- Ensure risks (including sustainability related risks) are considered in every decision-making process.
- Identify, assess and treat the risks relevant to their business areas.
- Ensure that the controls implemented to treat each risk area are adequate and effective.
- Report the identified risks and mitigation measures adopted, to the CEO (*or any other person nominated for this purpose*).
- Routinely monitor the identified risks and mitigation measures to ensure effectiveness.
- Ensure that the staff is aware of risk management procedure and their responsibilities in this regard.

4.6 General Employees' responsibility

All employees of the Company have the responsibility to support the identification of risks. All Employees are encouraged to report or provide information about their findings to the concerned risk owner.

4.7 Internal Audit

An internal audit plan designed and implemented to provide a suitable level of assurance to the Chief Executive Officer and Risk Management Committee that internal controls are operating effectively and efficiently around each of its identified material risk.

5. RISK MANAGEMENT PROCEDURE

5.1 Risk Strategy

The Company recognizes that risk is an integral component of business and is committed to managing the risk in a proactive and effective manner. The Company believes that the Risk cannot be eliminated. However, it can be treated by adopting the following strategies:

- **Transferred** to another party, who is willing to take risk, say by buying an insurance policy or entering into a forward contract.
- **Reduced**, by having good internal controls.
- **Avoided**, by not taking risky initiatives.
- **Retained (Accept)**, to either avoid/reduce the cost or in anticipation of higher profits by taking on more risk.

5.2 Risk Management process

The risk management system is based on a structured and systemic process which takes into account of the Company's internal and external risks.

The main elements of the risk management process are as follows:

- **Communicate and consult** – communicate and consult with internal and external stakeholders as appropriate at each stage of the risk management process and concerning the process as a whole.
- **Context & Criteria** – establishing the business (external & internal) context in which the rest of the process takes place. The criteria against which risk is evaluated, shall be established and the structure of the analysis shall be defined.
- **Identify risk** – identify where, when, why and how events could prevent, degrade, delay or enhance the achievement of the Company's objective.
- **Analyze & Evaluate risks** – assessing the risks in terms of impact and likelihood of occurrence and determine the level of risk by analyzing the range of potential consequences and how these could occur. Furthermore, it includes assessing the effectiveness of internal controls. This enables decisions to be made about the extent and nature of treatments required and about priorities.
- **Treat risks** – develop and implement specific cost-effective strategies and action plans for increasing potential benefits and reducing potential costs.
- **Record risks** – document the risks that have been identified in the risk register.
- **Monitor and review** – monitoring the effectiveness of all steps of the risk management process. Risks and effectiveness of treatment measures need to be monitored so that changing circumstances do not alter priorities.

The Company's risks may come from any internal or external event which, if it occurs, may affect the ability to efficiently and effectively operate:

- **Internal risks** – those risks that specifically relate to the Company's business itself and as such as generally within its control. They include risks such as employee related risks, strategic risks, and financial risks.
- **External risks** – those risks that are outside the control of the Company. They include risks such as market conditions and legislative change.

5.3 Risk Management methodology

The methodology adopted by the Company for managing and treating its risks can be defined as follows:

- Identify all the general activities (functional areas) involved in running the business.
- Identify the risks involved in undertaking the business activities through discussions & inquiries.

- Rate the likelihood of the risks identified. Likelihood is assessed to the assumption that there are no existing risk management and compliance processes in place. It is assessed as either Almost Certain, Likely, Possible, Unlikely and Rare.
- Rate the consequence of the risks identified. It is assessed as Catastrophic, Major, Moderate, Minor and Insignificant.
- Assign the risk rating (level) to every risk identified based on a combination of the likelihood & consequence. The rating may be assessed as High, Moderate and Low.
- Determine the appropriate treatment (risk strategy) for each risk.
- Assess whether the existing control(s) are adequate & effective, if not implement the alternative control(s) to treat the risk area.
- Develop and update the Risk Register.
- Raise awareness about managing risks across the organization through communicating the policy and responsibilities.
- Routinely monitor and review ongoing risks so that risk can be effectively managed.

6. MONITORING AND REVIEW

Risk management Committee measures the risk management performance, which is reviewed for appropriateness. Based on the results of monitoring and review, the Board of Directors makes the decisions on how the risk management policy can be improved. These decisions lead to improvements in the Company's management of risk and its risk management culture.

7. APPROVAL

The Board of Directors of the Company in its meeting held on September 23, 2024, considered and approved the amendments in this Policy.
