

BFL ASSET FINVEST LIMITED

RISK MANAGEMENT POLICY



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Company Circulation

Version Control

Document Version	Description of Change/ Annual Review	Date	Prepared / Changed by
1.0	RBI circular on Scale Based Regulation (SBR): A Revised Regulatory Framework for NBFCs issued on October 22, 2021	February 10, 2023	Compliance Department



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PREFACE

Risk Management is a Key aspect of the "Corporate Governance Principals and Code of Ethics" which aims to improvise the governance practices across the Companies Activities. The Management of Non-Banking Finance Company NBFCs have to base their business decisions on a dynamic and integrated risk management system and process, driven by corporate strategy. NBFCs are exposed to several major risks in the course of their business- credit risk, interest rate risk, equity price risk, liquidity risk and operational risk. It is therefore important that NBFCs should introduce effective risk management policy that addresses the issues relating to various business risks. NBFCs are required to ensure that a proper policy framework on Risk Management Systems with the approval of the Board is formulated and put in place. 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.

OBJECTIVE & PURPOSE OF POLICY:

The main objective of this policy is to ensure sustainable business growth with stability and to promote a pro-active 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 Management, in order to guide decisions on risk related issues.

This Policy represents the basic standards of Risk Assessment to be followed by the company. Changes in the Policy will become effective upon approval by the Board of Directors of the Company. All relevant employees must be thoroughly familiar or made familiar with it and make use of the material contained in this Policy.

The specific objectives of the Risk Management Policy are:

- 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.
- To establish a framework for the company's risk management process and to ensure its implementation.
- To enable compliance with appropriate regulations, wherever applicable, through the adoption of best practices.
- To assure business growth with financial stability.

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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.

BACK GROUND AND IMPLEMENTATION

The Company is prone to inherent business risks. This document is intended to formalize a risk management policy, the objective of which shall be identification, evaluation, monitoring and minimization of identifiable risks.

This policy is in compliance with the requirements under Section 134(3) (n) of the Companies Act, 2013, and pursuant to RBI circular No. RBI/2021-22/112 DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22, 2021 it is required to form Risk Management Committee for NBFC with asset size below of Rs. 1000 crore which requires the Company to lay down procedure for risk assessment and procedure for riskminimization. The extract of the said provision is as follows:

“Section 134(3) (n): 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.”

The Board of Directors of the Company along with Risk Management Committee shall periodically review and evaluate the risk management system of the Company so that the management controls the risks through properly defined network.

CONSTITUTION OF RISK MANAGEMENT COMMITTEE

The Board of Directors of the Company shall constitute Risk Management Committee consisting of such number of directors (executive or non-executive) as the Board may think fit.

The Board shall define the roles & responsibilities of the Risk Management Committee & may delegate monitoring & reviewing of the risk management plan to the Committee & such other functions as it may deem fit.

ROLE OF THE BOARD

The Board will undertake the following actions to ensure risk is managed appropriately:

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- The Board shall be responsible for framing, implementing and monitoring the risk management plan for the company.
- The Board shall define the roles and responsibilities 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.
- Ensure that the appropriate systems for risk management are in place.
- The independent directors shall help in bringing an independent judgment to bear on the Board's deliberations on issues of risk management and satisfy themselves that the systems of risk management are robust and defensible;
- Participate in major decisions affecting the organization's risk profile;
- Have an awareness of and continually monitor the management of strategic risks;
- Be satisfied that processes and controls are in place for managing less significant risks;
- Be satisfied that an appropriate accountability framework is working whereby any delegation of risk is documented and performance can be monitored accordingly;
- Ensure risk management is integrated into board reporting and annual reporting mechanisms;


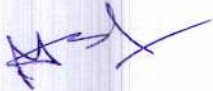
REVIEW

The Board of Directors, in their board meetings, will oversee the implementation of system and review its functioning periodically.

The above Policy was approved by the Board of Directors of the Company at their meeting held on November 09, 2022.



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Proposed by:	
Name	Signature
Company Secretary and Compliance Officer	
Reviewed by:	
Mr. Mahendra Kumar Baid Managing Director	
Approving Authority	Board of Directors
Date of Approval/ Review	February 10, 2023



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