



FIRSTMERIDIAN BUSINESS SERVICES LIMITED

Risk Management Policy

(Approved and adopted by Board on 12th April, 2022)

Purpose:

The purpose of the Risk Management Committee ("Committee") of the Board of Directors (the "Board") of FirstMeridian Business Services Limited (the "Company") shall be to assist the Board in fulfilling its corporate governance oversight responsibilities with regard to the identification, evaluation and mitigation of strategic, operational, and external environment risks associated with the Company. The Committee has overall responsibility for monitoring and approving the risk management framework and associated practices of the Company.

Section 134(3) of the Companies Act, 2013 (the "Act") requires the Board of Directors of a Company, as part of the Board's Report, to give ***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.***

Additionally, Regulation 21 of the SEBI Listing Obligation and Disclosure Requirement ("LODR") Regulations 2015 necessitates the constitution of Risk Management Committee to the top 500 Companies on the basis of market capitalization as at the end of the immediate previous financial year and Regulation 4 (2)(f) of SEBI LODR Regulations 2015 pertaining to the responsibility of the Board of Directors focuses on the Board maintaining appropriate systems of control, in particular, systems for risk management, it being one of the key functions of Board where responsibility is cast upon the Board to:

- review and guide Risk Policy
- ensure that appropriate systems of control are in place, in particular, systems for risk management
- ensure that, while rightly encouraging positive thinking, it does not result in over-optimism that either leads to significant risks not being recognized or exposes the company to excessive risk
- have ability to "step back" to assist executive management by challenging the assumptions underlying risk appetite

We at FirstMeridian Business Services Limited understand that controlling risks through a formal program is necessary for the well-being of our organization and everyone in it.

To this end, the Board of Directors of the Company have formed a Risk Management Committee to identify the risks impacting the Company's business and to formulate and administer policies/ strategies aimed at minimization and mitigation of risk as part of risk management.

Further, Internal Auditors have also been appointed to identify and assess key risks and formulate strategies for mitigation of risks identified in consultation with the process owners.

Committee membership and organization

The Risk Management Committee shall be appointed by and will serve at the discretion of the Board. The Risk Management Committee shall consist of no lesser than three members, majority of whom shall consist of members of the Board. The Chairman of the risk management committee shall be a member of the Board.

Risk Management Committee contain following Members:

Name of the Members	Designation
Ms. Pooja Prabhakar	Independent Director – Chairman
Mr. A.R. Chandrasekharan	Independent Director – Member
Mr. Nilay Pratik	Nominee Director – Member

Meetings and Quorum

The Committee shall meet at least once during each half year. Two members shall form the quorum for the meeting of the committee.

Risks can be broadly categorized into:

Risk Category	Description
Market Risks	<ul style="list-style-type: none"> • Market Strategy, Organizational Growth- Market Penetration, Market share, loss of reputation • Disruptive Technologies • Economic condition of the market, Global recession and
Strategic Risks	<ul style="list-style-type: none"> • Environmental Issues • Uncertainty surrounding political leadership in Domestic and • International Markets • Consistent Revenue growth • Cost Optimization

Operational Risks	<ul style="list-style-type: none">• Manpower retention• Disaster Management and Data security• Inefficient working capital management• Risks of commission or omission
Compliance Risks	<ul style="list-style-type: none">• Ensure stricter adherence to laws/ rules/ regulations/ standards• Adherence to company Policies and Procedures (SOPs)
Financial and Reporting Risks	<ul style="list-style-type: none">• Volatility in Currency, funding & Credit risk• Maintaining high standards of Corporate Governance and public disclosures

In adherence to the present regulatory mandates described herein above, the Risk Management Committee of the Board of Directors of the Company shall, through the Core Committee formed for the purpose:

- Ensure an organization relevant and perpetual Risk Management framework for identifying, assessing, responding to, monitoring or controlling and reporting risks.
- Apply an organized, thorough approach to effectively anticipate and mitigate the probable or realistic risks that could endanger achievement of key objectives.
- Ensure systemic risk evaluation, categorization, and prioritization thereof to assign relative importance to identified risks to determine where appropriate management attention is required.
- Evaluate significant risk exposures of the Company and assess management's actions to mitigate the exposures in a timely manner (including one-off initiatives, and ongoing activities such as business continuity planning and disaster recovery planning and testing).
- Practice the highest level of control measures by installing mechanisms and tools, with involvement of all process-owners across the organization, to ensure that all applicable legal, regulatory, and business requirements are up-to-date and met.
- Develop alternative/recommended courses of action for critical risks and control the probability of occurrence of the risk, keeping ready contingency plans for selected risks where the consequences of the risks are determined to be high.
- Review the activities, status, and results of the risk management process on a periodic and event-driven basis with appropriate levels of management and resolve issues i.e., gauging potential risk exposure and addressing the same with appropriate corrective action.
- Obtain, wherever required or desirable, the advice, opinion and assistance from outside legal, accounting, or other advisors, as necessary, to aid informed decision making.
- Coordinate its activities with the Audit Committee in instances where there is any overlap with audit activities (e.g., internal or external audit issue relating to risk management policy or practice).

The role and responsibilities of the Risk Management Committee shall include such other items as may be prescribed by applicable law or the Board in compliance with applicable law, from time to time.

The policy shall also be uploaded on the website of the Company at www.firstmeridian.com
