KIAN-M EXPORT LIMITED

RISK MANAGEMENT POLICY

1. Introduction

Kian-M Limited ("Company") is a public company whose equity shares are to be listed on Stock Exchange and subject to the rules and regulations issued by the Securities and Exchange Board of India ("SEBI")

In terms of Regulation 21 read Schedule II, Part D (c) of the **Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**Listing Regulations), the company is required to formulate a Risk Management Policy.

In compliance to the aforesaid regulations, the Board of Directors (the "Board") of Kian-M Limited (the "Company"), has adopted this Policy at its meeting held on 4th June, 2026 and the policy is effective from the date of listing of the Company's equity shares on the stock exchange.

2. Scope

This policy applies to all functions and units of the Company.

3. Purpose

The purpose of this document is to define the requirements around Risk Management. The policy sets out the objectives and accountabilities for risk management within the Company such that it is structured, consistent and effective.

4. Risk Management Objectives

The objective of the Risk Management Policy is to establish a structured and intelligent approach to Risk Management for the company with a view to create a "Risk Intelligent" organization. The broader objectives are to:

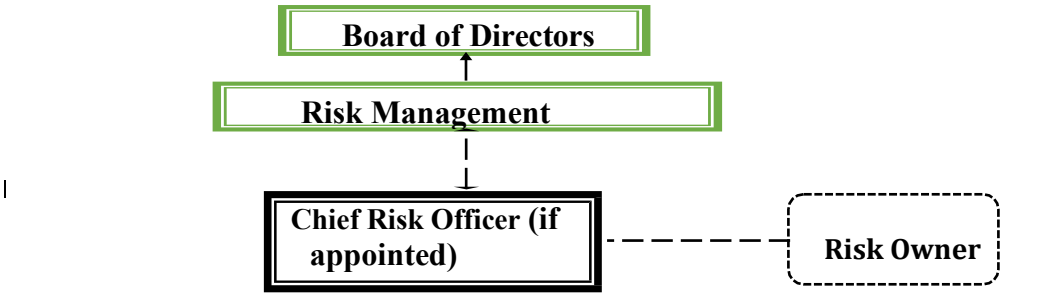
1. Provide a sound basis for good Corporate Governance practices;
2. Promote an innovative, risk aware culture in pursuit of opportunities to benefit the organization;
3. Support the achievement of the Company's mission, vision and strategic priorities in line with its core values;
4. Identify and pursue existing and new opportunities in accordance with the entity's risk appetite and strategy;
5. Integrate risk management in the culture and strategic decision-making across the organization;
6. Establish a risk intelligent framework for the organization;
7. Establish robust processes for identifying, assessing, responding to, monitoring and reporting on risk;
8. Anticipate and respond to changing social, environmental and legislative condition;
9. Facilitate compliance with the relevant legal and regulatory requirements and international norms.

5. Policy Principles

Company is committed to adopt a proactive approach to risk management which is based on the following underlying principles:

- Company endeavors to create risk awareness across the organization;
- The Company strives to anticipate and take preventive action to manage or mitigate the risks;
- The Company will align and integrate varying views on risk management and review and monitor a uniform risk management framework across all line of business, functions and geographies;
- The Company will strengthen the governance framework by focusing on proactive risk informed decision making to enable sufficient lead time before an unfavorable risk event occurs;
- All employees of the Company take responsibility for the effective management of risks in all aspects of the business.

Risk Management Structure



6. Management Governance Structure

The risk management governance structure has been developed keeping in mind the Company's structure, to ensure seamless integration of risk management process with the existing processes.

To achieve the stated policy and risk management objectives, the Company has established three levels of risk management responsibilities as: Risk Oversight, Risk Infrastructure & Management and Risk Ownership.

- The Board of Directors of the Company have the overall governance oversight responsibility with respect to risk management. Board will be responsible to review the risk management policy and process, define and review the risk appetite of the Company and provide direction to the management with respect to its Risk Management Practices.
- The Board has delegated the roles and responsibilities for risk governance and oversight to Risk Management Committee (RMC) of the Board.
- The Risk Management Committee may designate a responsible officer for implementation and monitoring of the Risk Management framework which helps in strengthening the risk monitoring and reporting process.

7. Roles & Responsibilities for Risk Management

Responsibility for risk management is shared across the organization. To manage risks across organization, risk management policy encompasses pillars of responsibilities that will cascade the scope of activities to senior management and all employees.

7.1 Risk Governance and Oversight

Board of Directors

The Board is fully committed to the objectives of Risk Management and its engagement in risk oversight function to strengthen the organizational resilience to significant risk exposures. The Board, through the Audit Committee and Risk Management Committee shall oversee the establishment and implementation of an adequate system of risk management across the Company.

The Board shall comprehensively review the effectiveness of the Company's risk management system on an annual basis.

Audit Committee

Audit Committee would be entrusted with the responsibility of periodic evaluation of risk management programme and provide insight and direction to the risk management committee.

Risk Management Committee

The Board of Directors has constituted Risk Management Committee (RMC or the Committee) in compliance with Regulation 21 of the Listing Regulations. The role of the Risk Management Committee, as outlined in Schedule II, Part D (c) of the Listing Regulations, shall, inter alia, include:

The role of the committee shall, *inter alia,* include the following:
(1) To formulate 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 Committee.
(b) Measures for risk mitigation including systems and processes for internal control of identified risks.
(c) Business continuity plan.
(2) To ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company;
(3) To monitor and oversee implementation of the risk management policy, including evaluating the adequacy of risk management systems;
(4) To periodically review the risk management policy, at least once in two years, including by considering the changing industry dynamics and evolving complexity;
(5) To keep the board of directors informed about the nature and content of its discussions, recommendations and actions to be taken;
(6) The appointment, removal and terms of remuneration of the Chief Risk Officer (if any) shall be subject to review by the Risk Management Committee.

The Risk Management Committee shall coordinate its activities with other committees, in instances where there is any overlap with activities of such committees, as per the framework laid down by the board of directors.

Further,

The Risk Management Committee shall have minimum three members with majority of them being members of the board of directors, including at least one independent director and in case of a listed entity having outstanding SR equity shares, at least two thirds of the Risk Management Committee shall comprise independent directors.

The Chairperson of the Risk management committee shall be a member of the board of directors and senior executives of the listed entity may be members of the committee.

The risk management committee shall meet at least twice in a year.

The quorum for a meeting of the Risk Management Committee shall be either two members or one third of the members of the committee, whichever is higher, including at least one member of the board of directors in attendance.

The meetings of the risk management committee shall be conducted in such a manner that on a continuous basis not more than two hundred and ten days shall elapse between any two consecutive meetings.

7.2 Risk Infrastructure and Management

To focus on Risk Management Governance and implementation, Company has constituted RMC which reports to the Board. This Committee has the primary responsibility of implementing the Risk Management Policy of the Company and achieving its stated objectives of developing a risk intelligent culture that supports strategic decision making and helps improve company performance.

The RMC will meet as required and carry out its roles and responsibilities as defined per the Board approved Charter

- Provide support and consultancy role, including facilitate and advise on the implementation of risk management and related matters across business units.
- Coordinate with the Chief Risk Officer (if any), all Business Head/ Functional Head and all the other stakeholders and set the limits and controls on risk appetite.
- Monitor all cyber-risk management activities to align with the overall enterprise risk profile of the organization.
- Identify high priority risk and report the progress to the Board on a periodic basis
- Receive the Risk Management Sheet from each function, and evaluate the appropriateness of countermeasure(s) and risk scoring
- Carry out any other activities as may be required or deemed necessary in this regard

<u>Chief Risk Officer (if appointed)</u>

The Chief Risk Officer (CRO) plays a pivotal role in the oversight and execution of the company's risk management function. Working closely with the Board of Directors (BoD), Audit Committee, Risk

Management Committee (RMC), the CRO shall be responsible for developing and implementing risk assessment policies, monitoring strategies, and implementing risk management capabilities. CRO shall facilitate the execution of risk management practices in the enterprise in the areas of risk identification, impact assessment, monitoring, mitigation and reporting.

The CRO's ultimate objective is to help the Board and executive management to determine the risk-reward tradeoffs in the business and bring unfettered transparency into the risk profile of the business.

7.3 Risk Ownership

Risk Owner

The final ownership of risks and mitigation rests with Risk Owner. The Risk Owner owns the complete risk register for the risks assigned to his/her name. The Risk Owner for a risk is usually a senior person in the business or enabling function, who can drive and monitor the progress of the mitigation strategies. The Risk Owner in turn may further delegate the mitigation strategies and action plans down the hierarchy to ensure ground level implementation of the mitigation action plans. The Risk Owner also regularly tracks and monitors the progress and status of risks.

8. Communication

This Policy shall be communicated to all Function / Division Heads and other stakeholders involved in risk management process across the Company.

9. Review

This Policy shall be reviewed on a periodical basis to ensure that it is aligned with the changes in business environment and regulatory requirements.

In the event of any conflict between the provisions of this Policy and of the Listing Regulations or any other applicable legal requirement ("Applicable Law"), the provisions of Applicable Law shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Law shall automatically apply to this Policy

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