

JMJ FINTECH LIMITED

(Formerly Known As Meenakshi Enterprises Limited)

RISK MANAGEMENT POLICY

1. PREAMBLE

At JMJ Fintech Limited (Formerly Known As Meenakshi Enterprises Limited) we recognize that effective risk management is paramount to our long-term success and sustainability. It encompasses the identification, assessment, and prioritization of risks, followed by strategic resource allocation to minimize, monitor, and control the impact of uncertain events. Our approach to risk management is not merely compliance-oriented but aims to instill a culture of proactive risk mitigation and opportunity realization across all levels of the organization.

The potential benefits of a robust risk management framework extend far beyond regulatory adherence. They include:

- Minimizing the occurrence of shocks and unwelcome surprises by anticipating and addressing potential threats.
- Enhancing communication channels within the organization, facilitating better collaboration and decision-making.
- Promoting operational efficiency through streamlined processes and resource allocation.
- Enabling swift identification and exploitation of emerging opportunities, driving innovation and growth.
- Supporting more effective use of resources by aligning them with strategic objectives and risk priorities.

It is our firm belief that the true value of structured risk management becomes evident during times of crisis, underscoring the importance of a proactive and holistic approach to risk governance.

2. LEGAL FRAMEWORK

Our risk management practices are guided by the regulatory mandates set forth in the Companies Act, 2013, and the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015. These regulations underscore the importance of developing and implementing a comprehensive risk management policy to safeguard the interests of stakeholders and ensure the company's long-term viability.

Section 134(3) of the Companies Act, 2013, mandates the Board of Directors to include a statement on the development and implementation of a risk management policy in their annual report. Furthermore, Section 177(4)(vii) of the same Act requires every Audit Committee to evaluate the effectiveness of the company's risk management systems.

The recent amendments to Regulation 21 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, further reinforce the need for listed entities to formulate and disclose a Risk Management Policy. As a top-ranked listed company, JMJ Fintech Limited (Formerly Known As Meenakshi Enterprises Limited) is committed to complying with these regulatory requirements and upholding the highest standards of risk governance.

3. PURPOSE AND SCOPE OF THE POLICY

Our Risk Management Policy serves as a guiding framework for identifying, assessing, and mitigating current and future risk exposures across the organization. The policy aims to achieve the following objectives:

- Ensure the comprehensive identification, assessment, and quantification of material risk exposures.
- Establish robust systems and processes for mitigating identified risks and enhancing internal controls.
- Conduct periodic reviews of the company's significant activities to identify emerging risks and opportunities.
- Foster a risk-aware culture throughout the organization, encouraging proactive risk management practices.
- Maintain regulatory compliance and adopt best practices to address evolving industry dynamics.
- Support sustainable business growth while maintaining financial stability.
- Keep the Board of Directors and shareholders informed of the company's risk management initiatives and status.

We recognize risk management as a fundamental component of our business operations and are committed to integrating risk considerations into our strategic decision-making processes.

4. RISK MANAGEMENT COMMITTEE

Composition: The Risk Management Committee comprises a minimum of three members, with a majority being members of the Board of Directors, including at least one Independent Director. The Committee Chairperson, who is a Board member, provides leadership and oversight to the committee's activities. Senior executives may also serve as committee members, contributing their expertise to risk governance initiatives. The Company Secretary acts as the Committee Secretary, facilitating smooth coordination and documentation of committee proceedings.

Meetings: The Risk Management Committee convenes at least twice a year, ensuring regular review and monitoring of the company's risk management framework. The Committee adheres to a structured meeting schedule, with no more than 180 days elapsing between consecutive meetings. A quorum, comprising a minimum of two members or one-third of the Committee, including at least one Board member, ensures effective deliberation and decision-making.

Role: The Risk Management Committee plays a pivotal role in formulating, implementing, and monitoring the company's risk management policies and procedures. The committee's responsibilities include:

- Developing a comprehensive risk management policy framework, encompassing internal and external risk factors relevant to the company's operations.
- Implementing measures to mitigate identified risks and enhance internal controls, including the formulation of a business continuity plan.
- Monitoring and overseeing the implementation of the risk management policy, evaluating the adequacy of risk management systems, and recommending enhancements as necessary.
- Conducting periodic reviews of the risk management policy to ensure alignment with changing industry dynamics and emerging risks.
- Providing regular updates to the Board of Directors on key risk management initiatives, discussions, and actions taken.
- Reviewing and approving the appointment, removal, and terms of remuneration of the Chief Risk Officer, if applicable, ensuring their alignment with the company's risk management objectives.

The Risk Management Committee collaborates with other committees, as necessary, to ensure coherence and alignment of risk management activities with broader governance objectives.

5. RISK MANAGEMENT FRAMEWORK PROCESS

Steps in Risk Management:

- Risk Identification
- Risk Assessment
- Risk Analysis
- Risk Treatment - Mitigation
- Risk Control and Monitoring

A. Risk Identification: This phase involves the continuous identification of events or factors that may impact the company's ability to achieve its strategic objectives. Risk identification processes are conducted through structured discussions, analysis of historical data, internal audits, and external assessments. Key risk owners across various functions actively contribute to this process, ensuring comprehensive coverage of potential risk areas.

B. Risk Assessment: Risk assessment entails evaluating the likelihood and potential impact of identified risks on the company's operations, financial performance, and reputation. The company employs both qualitative and quantitative techniques to assess risk severity, taking into account factors such as probability, magnitude, velocity, and persistence. Risks are categorized based on their criticality and likelihood of occurrence, enabling prioritization and focused mitigation efforts.

C. Risk Analysis: A thorough analysis of identified risks is conducted to understand their root causes, interdependencies, and potential cascading effects. External risks, such as economic, regulatory, and

market trends, are assessed alongside internal factors, including operational processes, organizational culture, and technology infrastructure. This analysis helps in developing targeted mitigation strategies and contingency plans to address potential risk scenarios effectively.

D. Risk Treatment - Mitigation: Once risks are identified, assessed, and analyzed, appropriate risk mitigation strategies are developed and implemented. These strategies aim to reduce the likelihood and impact of adverse events, enhance resilience, and strengthen the company's ability to respond effectively to emerging risks. Risk treatment options may include risk avoidance, risk transfer, risk mitigation, or risk acceptance, depending on the nature and severity of the risk.

E. Control and Monitoring Mechanism: Effective risk management requires robust control and monitoring mechanisms to track the implementation and effectiveness of risk mitigation measures. Key risk indicators (KRIs) and control metrics are established to measure risk exposure and monitor the performance of risk controls. Regular reviews and assessments are conducted to ensure that risks are adequately managed, and any deviations from planned risk treatment strategies are promptly addressed. Continuous monitoring of risk controls enables timely intervention and adjustment, minimizing the likelihood of risk realization and maximizing the effectiveness of risk management efforts.

6. BUSINESS CONTINUITY PLAN

Business continuity planning is an essential aspect of risk management, ensuring the company's ability to maintain critical business functions and operations in the event of a major disruption. A comprehensive business continuity plan outlines procedures and protocols to be followed during emergencies, such as natural disasters, cyberattacks, or operational failures. The plan covers various aspects, including crisis communication, resource allocation, alternate work arrangements, and recovery strategies. Regular testing and review of the business continuity plan are conducted to validate its effectiveness and identify areas for improvement. The Risk Management Committee oversees the development, implementation, and review of the business continuity plan, ensuring its alignment with the company's risk management objectives and regulatory requirements.

7. RISK REPORTING

Effective risk reporting is essential for informed decision-making and governance oversight. The Board of Directors, Audit Committee, and Risk Management Committee play key roles in reviewing and evaluating the company's risk management system and practices. Heads of Departments or designated personnel are responsible for implementing risk management systems within their respective areas of operation and providing regular updates on risk exposures and opportunities. While the company monitors and evaluates a wide range of risks, significant risks or those with a high likelihood or potential impact are reported to the relevant governance bodies for review and action. This ensures that the Board and committees are apprised of critical risk issues and can provide guidance and support as needed.

8. DISCLOSURES

Transparency and accountability are central to our risk management practices. The Board of Directors includes a statement on the development and implementation of the risk management policy in its annual report, as mandated by regulatory requirements. The Board, along with the Audit and Risk Management Committees, periodically reviews and evaluates the company's risk management system to ensure its effectiveness and alignment with strategic objectives. Any amendments or revisions to the risk management policy are made in accordance with regulatory requirements and after due consideration by the relevant governance bodies.

9. AMENDMENTS

The Risk Management Policy is a dynamic framework that evolves in response to changing regulatory requirements, industry trends, and emerging risks. The Board of Directors, based on recommendations from relevant committees, has the authority to amend the policy as deemed necessary. Any amendments or revisions to the policy are communicated to stakeholders in a timely manner and implemented in accordance with regulatory guidelines. The company remains committed to maintaining the highest standards of risk governance and adapting its risk management practices to effectively address evolving business challenges and opportunities.

APPROVED
Sd/-
Managing Director