EFFECTIVE DATE

The Policy shall come into effect on: **December 15, 2025**

RISK ASSESSMENT, MANAGEMENT AND MINIMISATION POLICY

INTRODUCTION:

This Policy in compliance with the requirements of Section 134 of the Companies Act, 2013 (**"the Act"**) and Regulation 17(9) and Regulation 21 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**"LODR Regulations"**).

The objective of this policy is to articulate an effective Risk Management Policy and process for the Symbiotec Pharmalab Limited (**"the Company"**) to promote a proactive approach in identifying, evaluating, reporting, and mitigating risks associated with the business and, in turn to ensure sustainable business growth with stability.

DEFINITIONS:

a) **"Act"** means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.

b) **"Audit Committee"** means the committee constituted by the board of directors in accordance with the Section 177 Act and Regulation 18 of LODR Regulations, as constituted from time to time.

c) "**Board of Directors**" shall mean the Board of Directors of the Company.

d) **"Company"** means Symbiotec Pharmalab Limited.

e) **"LODR Regulations"** means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

f) **"Policy"** means Risk Assessment, Management and Mitigation Policy.

g) **"Risk"** means a probability or threat of damage, injury, liability, loss, or any other negative occurrence that may be caused by internal or external vulnerabilities; that may or may not be avoidable by pre-emptive action.

h) **"Risk Assessment"** means the overall process of risk analysis and evaluation.

i) **"Risk Management"** is the process of systematically identifying, quantifying, and managing all Risks and opportunities that can affect achievement of a corporation's strategic and financial goals.

j) **"Risk Management Committee"** means the committee constituted by the board of directors in accordance with Regulation 21 of the LODR Regulations, from time to time.

k) "SEBI" means the Securities and Exchange Board of India.

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the Companies Act, 2013, SEBI (LODR) Regulations, 2015 or any other applicable law or regulation to the extent applicable to the Company.

RISK MANAGEMENT:

❖ **Principles of Risk Management:**

- The Risk Management shall provide reasonable assurance in protection of business value from uncertainties and consequent losses.
- All concerned process owners of the company shall be responsible for identifying & mitigating key Risks in their respective.
- The occurrence of Risk, progress of mitigation plan and its status will be monitored on periodic basis.

❖ **Risk Management Procedure:**

- **General:**

Risk management process includes four activities:

a) Framework for Risk Identification,
b) Risk Assessment,
c) Measures for Risk Mitigation and
d) Monitoring & Reporting.

- **Framework for Risk Identification:**

The purpose of framework of Risk identification is to identify the events that can have an adverse impact on the achievement of the business objectives. All Risks identified are documented and shall include internal and external risks including financial, operational, sectoral, sustainability (particularly ESG related risks), information, cybersecurity risks or any other risks as may be determined.

Risk documentation shall include risk description, category, classification, mitigation plan, responsible function / department.

The industry in which company operates generally faced risks namely a) climate conditions, b) regulatory, c) foreign exchange, d) competition, e) inputs, f) geography, g) research and development, h) environment, health and safety, i) receivables, j) cyber and information risks.

Internal Risk Factors: Internal risks are those which are essentially within the Company's control. Efforts are made to cover all relevant internal risks falling under the 7 M's of Management: Man, Money, Machine, Material, Method, Management and Measurement.

External Risk Factors: External risks refer to risks external to the business itself and are largely beyond the Company's control. Efforts are made to cover all relevant External risks as per PEST Analysis: Political/Legal, Economic, Social and

Technological. In addition, Environmental factor has also been incorporated, as it has a major impact on our Industry.

Other factors: All the risks that an organization faces such as strategic, financial, credit, market, liquidity, security, property, IT, legal, regulatory, reputational and other risks have been identified and assessed.

- **Risk Assessment:**

To meet the objectives of the Company, it is required to consider expected and unexpected events, pursuant to which it is imperative to make effective strategies for exploiting opportunities. Accordingly, the Company has identified key risks and developed plans for managing the same. However, the Company may always encounter additional risks, and this may be continuously updated.

Each identified Risk is assessed on two factors which determine the Risk exposure:

a) Impact if the event occurs.
b) Likelihood of event occurrence

It is necessary that Risks are assessed after taking into account the existing controls, so as to ascertain the current level of Risk. Based on the above assessments, each of the Risks can be categorized as – low, medium and high.

- **Measures for Risk Mitigation:**

The Risk Management Committee needs to ensure that a formal mitigation strategy is prepared and reviewed for Priority Risks. All identified Risks should be mitigated using any of the following Risk mitigation plan:

a) **Risk avoidance:** By not performing an activity that could carry Risk. Avoidance may seem the answer to all Risks but avoiding Risks also means losing out on the potential gain that accepting (retaining) the risk may have allowed.
b) **Risk transfer:** Mitigation by having another party to accept the Risk, either partial or total, typically by contract or by hedging / Insurance.
c) **Risk reduction:** Employing methods/solutions that reduce the severity of the loss e.g. concreting being done for preventing landslide from occurring.
d) **Risk retention:** Accepting the loss when it occurs. Risk retention is a viable strategy for small Risks where the cost of insuring against the Risk would be greater than the total losses sustained. All Risks that are not avoided or transferred are retained by default.
e) Develop systems and processes for internal control of identified risks.
f) Business continuity plan

- **Monitoring and Reporting:**

The Company shall record the framework and processes for effective identification, monitoring, mitigation of the Risks.

The Audit Committee shall be responsible for the evaluation of internal financial controls and Risk Management systems.

Risk Management Committee to review the Risks at least two times a year and add any new material Risk identified to the existing list considering changing industry dynamics and evolving complexity. These will be taken up with respective functional head for its mitigation.

The Risk Management Committee shall ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company.

The Risk Management Committee shall monitor and oversee implementation of the Policy, including evaluating the adequacy of Risk Management systems periodically review the Policy.

The Risk Management Committee shall report and update the Board periodically, on risk-related matters. The Annual Report of the Company shall disclose, the composition of the risk management Committee, meetings, attendance, and risk-related disclosures under LODR Regulations, as may be necessary to comply with the requirement.

REVIEW OF THIS POLICY:

This policy is framed based on the provisions of the Act and the requirements of the LODR Regulations. Risk Management Committee of the Company will review the policy periodically i.e. at least once in 2 years or such other period, as may be prescribed by the Act or the LODR Regulations.

In the event of any conflict between the provisions of this Policy and of the Act or LODR Regulations or any other statutory enactments, rules, the provisions of such Act or LODR Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the LODR Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy. Any changes or modification on the Policy as recommended by the Risk Management Committee would be presented for approval of the Board of Directors.