



DHARMAJ[®]
CROP GUARD LIMITED

Limitless
GROWTH

DHARMAJ CROP GUARD LIMITED

RISK MANANGEMENT POLICY



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1. PREFACE

Dharmaj Crop Guard Limited (hereinafter referred as “DCGL” or “the Company”) is the brainchild of highly experienced & professionals with an objective of providing innovative products to farmers to maximize their farm output.. The company was founded in 2015 and the success story of the company find it roots with the beginning of production in 2016.

Our wide range of products consists of high quality Eco friendly agrochemicals starts from insecticides, herbicides, fungicides, fumigants, plant growth regulators to rodenticides etc to cater every arena in the agricultural sector of crops, horticulture and floriculture. We, at Dharmaj, are constantly evolving and evaluating our products, finding novel solutions to the problems of Indian farmers. We are committed to optimum utilization of resources and innovative initiatives for well being of our farming community. The company is fully committed and have adopted a strategy of continuous expansion and development of high valued brands with a thrust on registration and marketing according to our customer needs and requirements to maintain its portfolio on a long run.

Keeping in view business of the Company, this Risk Management Policy is formed.

2. LEGAL FRAMEWORK

Risk Management Policy is framed as per the following regulatory requirements:

Regulation 17(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”) and provisions of Companies Act, 2013, as amended which requires the Company to lay down procedures about risk assessment and risk minimization.

Companies Act, 2013

i) Provisions of Section 134(3): There shall be attached to financial statements laid before a company in general meeting, a report by its Board of Directors, which shall include– (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.

ii) Section 177(4) stipulates: Every Audit Committee shall act in accordance with the terms of reference specified in writing by the Board which shall, inter alia, include, – (vii) evaluation of internal financial controls and risk management systems.

3. PURPOSE

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 and to abide by the provisions of the Companies Act 2013.

4. DEFINITIONS

- a) **Risk:** Risks are events or conditions that may occur, and whose occurrence, if it does take place, has a harmful or negative impact on the achievement of the organization’s business objectives. The exposure to the consequences of uncertainty constitutes a risk.
- b) **Risk Management:** Risk Management is the process of systematically identifying, quantifying, mitigating and managing all risks and opportunities that can affect achievement of a corporation’s strategic and financial goals.
- c) **Risk Strategy:** The Risk Strategy of a company defines the company’s standpoint towards dealing with various risks associated with the business. It includes the company’s decision on the risk tolerance levels, and acceptance, avoidance or transfer of risks faced by the company.
- d) **Risk Assessment:** Risk Assessment is defined as the overall process of risk analysis and evaluation.
- e) **Risk Estimation:** Risk Estimation is the process of quantification of risks.

Any other term shall have the same meaning as defined in the Companies Act, 2013 or any other applicable law or regulations.

5. ROLES & RESPONSIBILITY

The risk management roles and responsibilities will be as under:

Board of Directors	<ul style="list-style-type: none"> a) Approve risk policy and strategy b) To ensure that the Risk Management Policy is being followed effectively contributing to early identification of risks and mitigation process. c) Delegate the review & monitoring of implementation of Management Policy to the concerned person d) Reviews adequacy and effectiveness of business risk management e) Advise Business/support functions on Risk initiatives f) Responsible for identifying risks g) Responsible for preparing risk profile h) Responsible for managing risk i) Tests compliance at all relevant levels j) Quality assurance on risk management process
Employees	<ul style="list-style-type: none"> a) Compliance with requirement of this policy b) Exercise reasonable care to prevent loss, to maximize opportunity and to ensure that the operations, reputation and assets are not adversely affected



6. IDENTIFICATION AND CATEGORISATION OF RISKS

From the perspective of the Company, the risks can be of following nature:

- i. **Agro-climatic risks:** The agricultural growth of India is highly and directly affected by the weather patterns and pest attacks. Even the irrigated areas are indirectly dependent on monsoons. Poor monsoons translate into slower agro chemicals take-off and, therefore, affect the performance of the agro-chemical entities. Move over, the use of pesticides, fungicides or fertilizers also needs to be properly monitored, evaluated and then managed. These all risks are inherent in the agrochem business.
- ii. **Contractual Risk** - Contractual risk refers to the risk of having sub-optimal or erroneous clauses in the contract which could potentially compromise interests and/or provide unintended options/exit routes to other parties.
- iii. **Strategic Risk** - These risks are associated with operating in the particular industry and includes risks arising from demand changes or changes in customers, industry changes, intense competition, change in technology, Research & Development etc. These risks pose threats or opportunities which materially affect the ability of the organization to survive.
- iv. **Compliance Risk** -These risks are associated with the need to comply with laws and regulations etc. They also apply to the need to act in a manner which stakeholders and customers expect.
- v. **Operational Risk** - Such risks are associated with the company's operational and administrative procedures such as breakdown or failure of equipments used at the project sites, weather conditions, interruption in power supply due to breakdown of power generators, shortage of consumables, performance below expected levels of output or efficiency, natural disasters, obsolescence, labour disputes, industrial accidents, our inability to respond to technological advancements and emerging realty industry standards and practices etc.
- vi. **Financial Risk** - These risks are associated with financial structure of the company, its transactions and the financial system in place, liquidity risk, regulatory exposures, Imposition of fresh taxes by the Govt. etc.
- vii. **People Risk** - People risk is related with the understanding the needs of the employees and aligning it to organizational goals. This risk refers to the inadequate staffing in terms of number or skill sets for the work on hand or for projected or contingent work etc.

- viii. **Management Risk**- The risks associated with ineffective, destructive or underperforming management, which hurts shareholders and the company or fund being managed. This term refers to the risk of the situation in which the company and shareholders would have been better off without the choices made by management.
- ix. **Information Technology Risk** - Information technology risk may be described as the risk of Failure of hardware, Failure of software or Failure of the network. IT risk may result in Loss of data, decline in ineffectiveness of management controls, Delay in achieving milestones or Decline in operating efficiency.
- x. **Sovereign Risk** - Sovereign risk refers to the unanticipated change of laws or adhoc measures adopted by the government resulting in denial of expected/ contracted privileges.
- xi. **Environment Risk** - These are associated with release of polluting materials, environmental performance/compliance limits, business opportunities and breach of regulations.
- xii. **Transportation Risks:** It includes risk involved in transport & movement of containers containing hazardous or non-hazardous material. Any mishandling of hazardous substances by containers could affect the business adversely. These hazards can cause personal injury and loss of life, severe damage to and destruction of property and equipment, environmental damage and may result in the suspension of operations and the imposition of civil and criminal liabilities.
- xiii. **EXIM Risks:** It includes risk involved in export/ import segment of the Company. It basically involves the risk of non payment of exports at appropriate time, the risk relating to hedging foreign exchanges, political imbalance risks etc.

7. COMPLIANCE AND CONTROL

All the Senior Executives under the guidance of the Chairman and Board of Directors has the responsibility for over viewing management's processes and results in identifying, assessing and monitoring risk associated with Organization's business operations and the implementation and maintenance of policies and control procedures to give adequate protection against key risk. In doing so, the Senior Executive considers and assesses the appropriateness and effectiveness of management information and other systems of internal control, encompassing review of any external agency in this regards and action taken or proposed resulting from those reports.

8. CONTINUOUS ASSESSMENT

The Company's Risk Management is continuous process which implies a continuing cycle of implementing, monitoring, reviewing and managing risk management processes and simultaneously also sensitizing the organization against all possible risks.

9. **AUTHORITY FOR APPROVAL & ALTERATIONS**

The Board shall have the authority for approval of this policy.

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

10. **EFFECTIVE DATE**

The policy will be effective with effect from the date of approval by the Board.

11. **DISCLAIMER**

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any applicable law governing the Company, such applicable law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.

For **DHARMAJ CROP GUARD LIMITED**

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Ramesh Ravajibhai Talavia

Managing Director

DIN: 01619743

Date: 18-11-2021

Place: Ahmedabad