

	KUTCH COPPER LIMITED	Revision: 00
	RISK MANAGEMENT POLICY	Date.: 04.12.2025


At Kutch Copper Limited (KCL), we are committed to identifying, assessing, preventing, mitigating, and, where appropriate, remediating Environmental, Social, and Governance (ESG) risks and impacts across our sites, areas of influence, and supply chains. This policy aims to adhere to our group level risk management charter and is aligned with relevant legal, regulatory, and industry standards.

This policy applies to Kutch Copper Limited (KCL) operations and related areas, including supply chains and business relationships. It addresses ESG risks and impacts connected to KCL's activities, products, or services.

Every individual within the organization has a shared responsibility to adhere to the principles of this policy, thereby ensuring a cohesive and proactive risk management culture. Contractors, suppliers, and other business partners are expected to establish and maintain effective policies and management systems to identify, prevent and mitigate ESG risks and adverse impacts; please refer to our Responsible Sourcing Policy and Code of Conduct.

To achieve this, Kutch Copper Limited shall strive to:

- To identify, assess, prevent, mitigate, and, where appropriate, remediate Environmental, Social, and Governance (ESG) risks and impacts.
- Establishing clear thresholds for acceptable levels of risk in alignment with strategic objectives and organizational values.
- Implementing a unified approach that addresses both conventional risks and strategic opportunities to strengthen decision-making processes.
- Embedding risk considerations within strategic decision-making and planning, performance evaluations, and capital allocation decisions.
- Facilitating interdepartmental collaboration to ensure alignment among risk management and assurance functions.
- Maintaining a risk register covering all the aspects of operations and value chain, including strategic, operational, sustainability and ESG, and project risk domains.

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- Promoting ownership and accountability of risk management processes across all organizational tiers.
- Aiming to prevent and minimize ESG risks through a mitigation hierarchy of avoidance, reduction, and, where needed, remediation. Where impacts occur, engaging with the stakeholders and supporting appropriate solutions.
- Promoting responsible practices and collaborating in line with applicable ESG principles for value chain risks and impacts.
- Providing training programs to strengthen risk management skills.

The aforesaid policy shall be made available to all the relevant stakeholders. The policy shall be reviewed periodically, at least every two years, for its appropriateness and updated as necessary to ensure continued relevance and alignment with regulatory updates, industry standards, and operational changes.

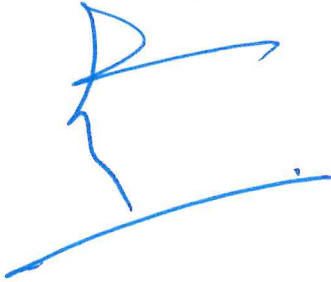
Oversight & Responsibility:

At KCL level, the policy is overseen by the Managing Director, which retains ultimate accountability for the implementation of this Policy. The KCL Risk Management Committee is responsible for facilitating the development, implementation, and periodic review of the risk management framework and associated policies.

Under site leadership, the Operations and Maintenance (O&M) team is responsible for embedding risk management related considerations into relevant systems and processes. Risk owners are tasked with the identification and proactive management of risks within their respective domains, while Risk Champions and Coordinators support the operationalization and dissemination of risk management initiatives across the organization. Employees and other workers are responsible for upholding the principles and practices outlined in this Policy, promptly reporting identified or potential ESG risks or impacts through appropriate internal channels, and contributing to a culture of

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resilience.



Dr. Vinay Prakash
Managing Director
Date: 04.12.2025

