RISK MANAGEMENT POLICY
Supergrowth Investments Private Limited

1. INTRODUCTION, PURPOSE AND SCOPE

1.1 This Risk Management Policy (**"Policy"**) sets out the framework and principles adopted by Supergrowth Investments Private Limited (**"Company"**) for the identification, assessment, treatment, monitoring and reporting of the risks to which the Company is, or may be, exposed in the conduct of its business.

1.2 The Company has adopted this Policy as a matter of good governance, and having regard to the principle reflected in Section 134(3)(n) of the Companies Act, 2013, under which the report of the Board of Directors is to include a statement on the development and implementation of a risk management policy for the company. This Policy is proportionate to the Company's size, nature of operations and stage of growth.

1.3 The objectives of this Policy are to:

(a) establish a structured and consistent approach to identifying and managing risk across the Company;

(b) integrate risk management into the Company's decision-making, planning and day-to-day operations;

(c) define clear roles, responsibilities and accountability for risk management;

(d) enable risks that may threaten the Company's objectives, or its existence, to be identified and escalated in a timely manner; and

(e) support compliance with Applicable Law and with the Company's other policies.

1.4 This Policy applies to all directors, officers and employees of the Company, and, to the extent relevant, to its agents, sub-contractors and service providers. It is to be read together with the Company's other policies, including its Corporate Governance Policy. In the event of any conflict between this Policy and Applicable Law or the Company's Articles of Association, Applicable Law and the Articles of Association shall prevail.

2. DEFINITIONS

2.1 In this Policy, unless the context otherwise requires:

(a) **"Applicable Law"** means any statute, rule, regulation, direction, notification, order, guideline or policy of any Governmental Authority having jurisdiction over the matter in question, as amended from time to time;

(b) **"Board"** or **"Board of Directors"** means the board of directors of the Company;

(c) **"Governmental Authority"** means any government or statutory, regulatory, judicial or quasi-judicial authority having jurisdiction over the Company;

(d) **"Risk"** means any event, condition or circumstance, whether internal or external, that may adversely affect the achievement of the Company's objectives, its operations, its financial position, its compliance obligations or its reputation;

(e) **"Risk Appetite"** means the amount and type of Risk that the Company is willing to accept in pursuit of its objectives;

(f) **"Risk Management Committee"** means any committee constituted by the Board under Clause 4 to assist it in discharging its risk-management responsibilities;

(g) **"Risk Owner"** means the individual or function responsible for managing a particular Risk or category of Risk; and

(h) **"Risk Register"** means the record maintained by the Company under Clause 8 documenting identified Risks and their treatment.

3. RISK MANAGEMENT PRINCIPLES

3.1 The Company's approach to risk management is founded on the following principles:

(a) risk management is a continuous process embedded in the Company's operations and decision-making, rather than a periodic or standalone exercise;

(b) risk is managed on a proportionate, risk-based approach, with the greatest attention given to the Risks of highest likelihood and impact;

(c) roles and responsibilities for risk management are clearly allocated and understood;

(d) Risks are identified and escalated in a timely and transparent manner; and

(e) the framework is reviewed and improved on an ongoing basis in the light of experience and of changes in the Company's business and environment.

4. RISK GOVERNANCE AND RESPONSIBILITIES

4.1 Board of Directors

The Board has overall responsibility for the Company's risk management. The Board shall approve this Policy and the Company's Risk Appetite, oversee the risk management framework, review the principal Risks facing the Company (including any Risks that may threaten its existence), and satisfy itself that adequate and effective risk management and internal control systems are in place.

4.2 Risk Management Committee



The Board may constitute a Risk Management Committee, or delegate risk-oversight functions to another committee of the Board, with the composition and terms of reference determined by the Board. Where no such committee is constituted, its functions under this Policy shall be discharged by the Board.

4.3 **Management**

The Company's senior management is responsible for implementing this Policy, for maintaining day-to-day risk management and internal controls, for assigning Risks to Risk Owners, and for reporting to the Board or the Risk Management Committee on the status of material Risks.

4.4 **Risk Owners**

Each Risk Owner is responsible for identifying, assessing, treating and monitoring the Risks allocated to them, and for reporting on those Risks in accordance with this Policy.

4.5 **Assurance**

The Company's internal audit or compliance function, or such other person as the Board may designate, shall provide independent review of the adequacy and effectiveness of the risk management framework.

5. RISK MANAGEMENT PROCESS

5.1 The Company shall manage Risk through a continuous process comprising the following stages:

(a) **Risk identification:** identifying Risks arising from internal and external sources that may affect the Company's objectives;

(b) **Risk assessment:** assessing each identified Risk according to its likelihood of occurrence and its potential impact, and prioritising Risks accordingly;

(c) **Risk treatment:** determining and implementing an appropriate response to each Risk, being to avoid, reduce, transfer or accept the Risk, together with the controls and mitigation measures required;

(d) **Monitoring and review:** monitoring Risks and the effectiveness of controls on an ongoing basis, and reassessing Risks as circumstances change; and

(e) **Reporting:** reporting on Risks and their treatment in accordance with Clause 8.

6. RISK CATEGORIES

6.1 The Company shall identify and manage Risks across the categories relevant to its business, which may include:



(a) **Strategic and business risk:** risks arising from the Company's business model, markets, competition, growth plans and external economic conditions;

(b) **Operational risk:** risks arising from inadequate or failed internal processes, people or systems, including process failures and human error;

(c) **Financial risk:** risks relating to liquidity, cash flow, credit exposure, foreign exchange, and the accuracy and integrity of financial reporting;

(d) **Technology, information-security and cyber risk:** risks relating to the availability, integrity and security of the Company's information-technology systems and data, including cyber-attacks and system failures;

(e) **Data-protection and privacy risk:** risks relating to the collection, processing, storage and transfer of personal data (including any personal data of a sensitive nature that the Company may process), and to compliance with the Digital Personal Data Protection Act, 2023 and the rules made thereunder;

(f) **Legal, regulatory and compliance risk:** risks arising from non-compliance with Applicable Law, with contractual obligations, or with the Company's internal policies;

(g) **Third-party and outsourcing risk:** risks arising from the Company's reliance on vendors, service providers, agents and other third parties;

(h) **Business-continuity risk:** risks to the continuity of the Company's operations arising from disruptive events;

(i) **Reputational risk:** risks to the Company's reputation and stakeholder confidence arising from any of the above or from the conduct of the Company or its personnel; and

(j) **Other risks:** such other Risks as may be relevant to the Company's business, activities, products, services or regulatory environment from time to time.

6.2 To the extent the Company performs any function for or on behalf of a bank or non-banking financial company, or otherwise operates within a regulated financial-services or digital-lending framework, it shall additionally identify and manage the Risks arising from that role, including the associated regulatory, outsourcing and customer-protection Risks, consistently with Applicable Law and with the requirements of the relevant regulated entity.

7. RISK APPETITE AND TOLERANCE

7.1 The Board shall determine the Company's Risk Appetite, being the level and types of Risk the Company is prepared to accept in pursuit of its objectives, and shall set tolerance thresholds for material Risks where appropriate. Risks that exceed the



approved Risk Appetite or tolerance thresholds shall be escalated to, and addressed by, the Board or the Risk Management Committee.

8. RISK REGISTER AND REPORTING

8.1 The Company shall maintain a Risk Register recording the material Risks identified, their assessment, the relevant Risk Owner, and the controls and mitigation measures in place, and shall update it periodically.

8.2 Management shall report to the Board or the Risk Management Committee, at least on a half-yearly basis and more frequently where circumstances require, on the Company's material Risks, any significant change in the Company's risk profile, any breach of Risk Appetite or tolerance, and the status of mitigation measures.

9. INTERNAL CONTROLS

9.1 The Company shall maintain a system of internal controls appropriate to its size and operations, designed to provide reasonable assurance regarding the effectiveness and efficiency of operations, the reliability of financial reporting, the safeguarding of assets, and compliance with Applicable Law. The Board shall periodically review the adequacy and effectiveness of these controls.

10. BUSINESS CONTINUITY

10.1 The Company shall maintain arrangements for business continuity and operational resilience appropriate to its size and operations, designed to enable the Company to continue or promptly resume its critical operations in the event of a significant disruption, and shall review and, where appropriate, test those arrangements periodically.

11. INTEGRATION WITH OTHER POLICIES

11.1 This Policy operates together with the Company's other policies addressing specific categories of Risk, including its policies on corporate governance, information security and data protection, and the prevention of money laundering, and does not limit any more specific requirement set out in those policies or in Applicable Law.

12. TRAINING AND AWARENESS

12.1 The Company shall promote awareness of risk management among its directors, officers and employees, and shall provide such training as it considers appropriate to enable them to discharge their responsibilities under this Policy.

13. REVIEW AND AMENDMENT

13.1 The Board shall review this Policy at least once each financial year, and upon any material change in Applicable Law or in the Company's business, and may amend, modify or replace it at any time. Any provision of this Policy that becomes inconsistent



with Applicable Law shall, to the extent of such inconsistency, be deemed modified to conform to Applicable Law, and the remaining provisions shall continue in effect.

14. ADOPTION AND EFFECTIVE DATE

14.1 This Policy was approved and adopted by the Board of Directors of the Company, and is effective since 2000. The latest review of this Policy was carried out on 30 April 2026.

