

BHARAT COKING COAL LIMITED

RISK MANAGEMENT POLICY

1. Foreword

1.1 Objective

This Risk Management Policy (“**Policy**”) has been approved and adopted by the Board of Bharat Coking Coal Limited (“**Company**”) on May 27, 2025. 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 of the Company and to attempt to develop risk policies and strategies to ensure timely evaluation, reporting and monitoring of key business risks. In order to achieve the key objective, the Policy establishes a structured and disciplined approach to Risk Management in order to guide decisions on risk evaluating & mitigation related issues. The Policy is in compliance with the Regulations 17(9) and 21 of Securities and Exchange Board of India (*Listing Obligations and Disclosure Requirements*) Regulations, 2015 as amended (“**SEBI Listing Regulations**”) and the applicable provisions of Companies Act, 2013, as amended (“**Companies Act**”) which requires the Company to lay down procedures about risk assessment and risk minimization.

1.2. Applicability

This Policy applies to every part of the Company’s business and functions.

2. Definitions

- 2.1 “**Board**” means the Board of Directors of the Company.
- 2.2 “**Company**” means Bharat Coking Coal Limited.
- 2.3 “**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.
- 2.4 “**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.
- 2.5 “**Risk Management Committee**” means the Committee formed by the Board in accordance with the Regulation 21 of the SEBI Listing Regulations.
- 2.6. “**Risk Assessment**” means the overall process of risk analysis and evaluation.

3. Composition

The Risk Management Committee shall have a minimum of three members with the majority of them being members of the board of directors, including at least one independent director. The senior executives of the listed entity may also be members of the committee.

4. Secretary:

The Company Secretary shall acts as a secretary to the Risk Management Committee.

5. Risk Management

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

6. Risk Management Procedures

6.1 General

Risk management process includes four activities: Framework for Risk Identification, Risk Assessment, Measures for Risk Mitigation and Monitoring & Reporting.

6.2 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 head of the respective departments within the Company shall be responsible for implementation of the risk management system as may be applicable to their areas of functioning and report to the Risk Management Committee.

Risk is an integral and unavoidable component of any business and the Company is committed to manage various risks in a proactive and effective manner.

The Risk Management Committee will review and monitor various risks identified, based on their impact and significance. The Risk Management Committee will also suggest the action plans to mitigate critical risks, whereas the risks that are not significant enough shall be dropped for further attention. The objective is to reduce the loss or injury arising out of various risk exposures.

6.3. Risk Assessment

Assessment involves quantification of the impact of Risks to determine potential severity and probability of occurrence. Each identified Risk is assessed on two factors which determine the Risk exposure:

- i. Impact if the event occurs
- ii. Likelihood of event occurrence

Risk Categories: 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.

The following are the broad areas to determine the various risks, their probability and available data in the public domain:

- a. Economic conditions,
- b. Environment related risks,
- c. Market related risks,

- d. Fluctuations in foreign exchange based on the exposures,
- e. Political developments and likely changes in major policies of the Government,
- f. Inflation and cost structures,
- g. Technological obsolescence,
- h. Financial reporting risks,
- i. Corporate accounting fraud,
- j. Legal risks, includes compliance with local laws, rules and regulations,
- k. Challenges to the quality of products,
- l. Project quality, implementation and delayed commissioning,
- m. Human Resources Management, local cultures and values,
- n. Cyber Security risk.

Measures for Risk Mitigation

The following framework shall be used for implementation of Risk Mitigation:

All identified Risks should be mitigated using any of the following Risk mitigation plan:

- I. 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.
- II. Risk transfer: Mitigation by having another party to accept the Risk, either partial or total, typically by contract or by hedging / Insurance.
- III. Risk reduction: Employing methods/solutions that reduce the severity of the loss e.g. concreting being done for preventing landslide from occurring.
- IV. 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.
- V. Develop systems and processes for internal control of identified risks.
- VI. Business continuity plan.

7. Monitoring and reviewing Risks

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 once 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, at least once in two years, including by considering the changing industry dynamics and evolving

complexity. The Risk Management Committee shall also keep the Board informed about the nature and content of its discussions, recommendations and actions to be taken in relation to the Risks.

Appraised by the Risk Management Committee to Board on an annual basis including recommendations made by the Committee and actions taken on it.

The Risk Management Committee shall coordinate its activities with other committees in instances where there is any overlap with activities of such committees as per the framework laid down by the Board of Directors. Further, the Committee shall review appointment, removal and terms of remuneration of Chief Risk Officer, if any.

8. Senior Management:

The Company's Senior Management shall design and implement risk management and internal control systems identifying material risks for the Company and taking necessary measures. The management of the Company shall implement the action plans developed to address material business risks across the Company and each of the business units.

The Senior Management shall regularly meet and evaluate the effectiveness of the action plans and the performance of employees in implementing actions plans as appropriate. It should also ensure the compliance with the internal risk control systems and processes by the concerned employees.

9. Review, Amendment and Enforcement

Any change in the Policy shall be approved by the board of directors ("**Board**") of the Company. The Board shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. The Audit Committee and the Board will periodically review the Policy and the procedures set out thereunder. Any subsequent amendment/modification in the Companies Act or the rules framed thereunder or the SEBI Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.

This Policy shall be made enforceable immediately on listing of equity shares of the company on any stock exchange.

10. Communication of this Policy

This Policy shall be hosted on the website of the Company.