

TRIOCHEM PRODUCTS LIMITED

MANUFACTURERS OF ETHICAL PHARMACEUTICAL PRODUCTS



Regd. Office : 4th Floor, Sambava Chambers, Sir P. M. Road, Fort, Mumbai - 400 001.
Tel. : 00 91 (22) 4082 8100 | Fax : 00 91 (22) 4082 8181 | E-mail : info@amphray.com
Corporate Identity Number : L24249MH1972PLC015544

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RISK MANAGEMENT POLICY

1. INTRODUCTION

This policy sets out **Triochem Products Limited** vision on risk management (RM) and defines the risk management principles and guidelines with which **Triochem Products Limited** needs to comply.

2. DEFINITIONS

- 2.1. Board means Board of Directors of the Company.
- 2.2. A director means Directors of the Company.
- 2.3. Committee means Risk Management Committee of the Company as constituted or reconstituted by the Board.
- 2.4. Company means **Triochem Products Limited**.
- 2.5. Senior Executives means personnel of the Company occupying the position of Chief Executive Officer (CEO) of any unit / division or occupying the position of General Manager and above of any unit / division of the Company. Unless the context otherwise requires, words and expressions used in this policy and not defined herein but defined in the Companies Act, 2013 as may be amended from time to time shall have the meaning respectively assigned to them therein.

3. CONSTITUTION OF THE COMMITTEE

- 3.1. The Committee shall consist of a minimum 3 members, majority of which shall be the Directors of the Company.
- 3.2. Minimum two (2) members shall constitute a quorum for the Committee meeting.
- 3.3. Membership of the Committee shall be disclosed in the Annual Report.
- 3.4. The Chairman of the Committee shall be elected from amongst the members but he shall be a Director of the Company.



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3.5. The Company Secretary of the Company shall act as the Secretary to the Committee.

4. SCOPE

4.1. The Board of Directors shall define the roles and responsibilities of the Committee. The Board of Directors may from time to time evaluate the effectiveness of the Policy considering the changed business environment. The Committee shall meet as and when required. The Committee shall place its report on its meeting at the immediately succeeding Board Meeting. The Board may at its discretion invite the members of the Committee to participate in the Board Meeting.

4.2. The Company maintains a multi-dimensional risk management system in which all executive officers participate. Under this system, executive officers are responsible for risk management in their assigned areas of operation. In addition, executive officers exchange information and participate in important management initiatives and decisions through regularly scheduled executive officers' meetings.

4.3. Strictly adhering to this management structure and system, the Company is redoubling its efforts to implement measures aimed at minimizing business risks and detecting them at an early stage at which they may have significant social impact, such as those related to corporate ethics and compliance, the environment and product quality, to fulfil its responsibilities to stakeholders.

5. RESPONDING TO ENVIRONMENT RISK

5.1. The Company works to quickly discover latent risks in business activities that can impact or potentially impact the environment in a substantial way.

5.2. In order to prepare for the event of an accident or emergency, head office divisions, manufacturing facilities, R&D centres, branches, affiliates, and all other organizations have developed detailed risk descriptions and procedure manuals that specify departmental responsibilities. The Company also

anticipates the possibility of accidents, claims, or violations of the law occurring by construction subcontractors or companies working under outsourcing agreements, and informs these outside parties



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of our risk response procedures, as well as request that they ensure to implement the proper procedures in their respective organizations.

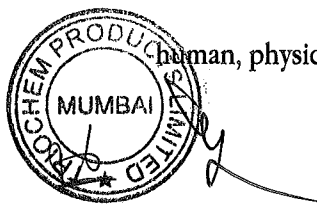
- 5.3. Each of our business sites run tests once a year to determine if the managers in charge are capable of appropriately responding to an emergency. The tests simulate an emergency that has the potential of occurring to determine whether communication channels, the chain of command, movement methods at the site, and reporting procedures function properly. When problems are uncovered, the procedures are revised and the new version is publicized throughout the organization. The tests also serve as drills to help employees become proficient in the proper response procedures.

6. APPROACH TO INFORMATION SECURITY RISK

- 6.1. The Company has opportunities to obtain personal information from customers through various means. To handle personal information carefully, and to manage properly, we established management system for protection of personal information.
- 6.2. We have extended security management not only for personal information but also for confidential corporate information, which includes information on sales, engineering matters and intellectual property. Such information is managed through organizational, human, physical and technological security measures. When information is entrusted to us by other companies, we follow non-disclosure agreement. Moreover we manage and protect such information using the same security measures as apply to our in-house information.

7. MANAGEMENT PRINCIPLES

- 7.1. We continuously strive to improve our activities for managing confidential corporate information and protecting personal information through a plan-do-check-act or PDCA, cycle, and with organizational, human, physical and technological security measures.



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8. CONFIDENTIAL CORPORATE INFORMATION AND SECURITY MEASURES

8.1. We revise internal rules as needed to comply with current laws. Furthermore, we instruct all employees' basic way in daily work through distributing the brochure on the management of confidential corporate information and on the protection of personal information. The status of management for confidential corporate information and personal information is constantly checked through internal audits by staff of the head office, in addition to self-inspection. Our group will improve the quality of management by going through the PDCA cycle for ensuring information security.

9. ESCALATION OF RISK AND EVALUATION OF RISK MANAGEMENT PROCESS

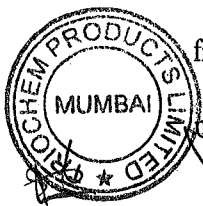
9.1. Escalation of risk

9.1.1. Business risks are evaluated on a continuous basis as part of standard management process.

However, for some emerging risks/events, immediate action may be required. These are the events / risks which have a significant impact on the business and are likely to cause a significant deviation in the project results/profit. These instances should be escalated to management to ensure they remain informed and involved in a timely manner. Risk Escalation must be performed for all business process.

9.2. Risk Management Evaluation

9.2.1. The Risk Management process itself, including the Risk Management Policy is subject to an evaluation process as well. The evaluation process will be the responsibility of all divisions within the organisation but it will also be part of the regular Risk Management Committee meetings organized and conducted. All Directors and Senior Executives, wherever invited or part of the Committee must attend these meetings. The Director will base on the input and/or specific requests from the senior management executives define the agenda for the Risk Management Committee meetings.



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9.2.2. Risk Management Committee will also perform on-site evaluations on the implementation of the risk management process. Findings and observations made during these on-site evaluations will be communicated to the Risk Management Committee and will also be used as input for the forthcoming meetings.

For Triochem Products Limited

Ramu S. Deora

Director & CEO

DIN: 00312369

Date: 30th March, 2015

