ARYAMAN
CAPITAL MARKETS LIMITED

RISK MANAGEMENT POLICY

Author of the Policy	Ms. Anjali Gorsia Chief Regulatory Officer – Aryaman Group
Approved by Designated Director- FIU, PMLA (name & date):	Shreyas Shah Designated Director
Reviewed by the Board on	**May 18, 2026**
Name of the entity	Aryaman Capital Markets Limited

INTRODUCTION

Requirement as per Companies Act, 2013

- **Responsibility of the Board**: As per Section 134(n) of the Act, The Board of Director's report must include a statement indicating development and implementation of a risk management policy for the Company including identification of elements of risk, if any, which in the opinion of the Board may threaten the existence of the Company.

- **Responsibility of the Audit Committee**: As per Section 177 (4)(vii) of the Act, the Audit Committee shall act in accordance with the terms of reference specified in writing by the Board which shall, inter alia, include evaluation of internal financial controls and risk management systems.

- **Responsibility of the Independent Directors:** As per Schedule IV [Part II-(4)] of the Act, Independent directors should satisfy themselves that financial controls and the systems of risk management are robust and defensible.

REQUIREMENT OF CLAUSE 49 OF THE LISTING AGREEMENT

- **Responsibility of the Audit Committee**: The role of the audit committee shall include the reviewing of the company's financial and risk management policies.

Pursuant to the above-mentioned requirement, Aryaman Capital Markets Limited (the "**Company**") has framed this Risk management Policy (the "**Policy**") for identifying risks, measuring the probability and the possible impact of events, and treating risks, eliminating or reducing their effect with the minimum investment of resources.

APPLICABILITY

This Policy applies to all areas of the Company's operations.

STEPS IN RISK MANAGEMENT

1. **Identify Risk**: Recognize potential threats or vulnerabilities that could negatively impact objectives, operations, or assets.

2. **Risk Assessment**: Analyse and evaluate the identified risks based on their likelihood and potential impact.

3. **Risk Treatment**: Develop and implement strategies to mitigate, transfer, accept, or eliminate the assessed risks.

4. **Risk Control and Monitoring**: Continuously track risk factors and the effectiveness of risk treatments, updating measures as necessary.

COMPLIANCE AND CONTROL

The Chairman and the Board of Directors are responsible for overseeing management's processes and outcomes in identifying, assessing, and monitoring risks associated with the Organisation's business operations. This includes ensuring the implementation and maintenance of effective policies and control procedures that provide adequate protection against key risks. In fulfilling this role, the Board evaluates the adequacy and effectiveness of management information systems and other internal controls,

including reviewing reports from external agencies and the actions taken or proposed in response to those reports.

The risk management policy will cover the following areas:

- Assessment of the Company's risk profile and key areas of risk in particular.
- Recommending to the Board and adopting risk assessment and rating procedures.
- Examining and determining the sufficiency of the Company's internal processes for reporting on and managing key risk areas.
- Assessing and recommending to the Board acceptable levels of risk. Development and implementation of a risk management framework and internal control system. On an annual basis, agreeing with the Audit Committee which aspects of the internal audit are nonfinancial aspects to be monitored. In relation to the non-financial aspects of the internal audit.
- monitoring the progress of the Company's auditors against the audit plan;
- reviewing all relevant representation letters signed by management;
- discussing the results of the internal audit with the Company's auditors; inquiring if there have been any significant disagreements between management and the Company's auditors; and monitoring
- Management's response to the Company's auditors' recommendations that are adopted. Initiating and monitoring special investigations into areas of corporate risk and break-downs in internal control.
- Reviewing the nature and level of insurance coverage.

REVIEW

This policy shall be reviewed whenever amendments are proposed or required. The review ensures the policy remains relevant, effective, and aligned with current regulations and organizational needs.

Notwithstanding anything contained in this policy, we shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to us from time to time. This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to policy and records shall be deemed to be covered in this Policy without any review.

AMENDMENT

This Policy can be modified at any time by the Board of Directors of the Company.