FAMILIARISATION PROGRAMME

FOR

INDEPENDENT DIRECTORS

In terms of Regulation 25(7) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

1. BACKGROUND

The Listing Regulations require listed companies to conduct familiarization programme for the Independent Directors so as to familiarize them with the company, nature of the industry in which the company operates, business model of the company, roles, rights and responsibilities of the independent directors and any other relevant information The Company facilitates the members of the Board to familiarize themselves with the industry and its operations.

2. PREAMBLE

Regulation 25(7) of the SEBI (LODR) Regulations, 2015, inter-alia stipulates that the Company shall familiarize the Independent Directors with the Company, their roles, rights, responsibilities in the Company, nature of the industry in which the Company operates, business model of the Company, etc., through various programmes.

3. PURPOSE AND OBJECTIVE

The Familiarization Programmes are aimed to familiarize the independent directors with the company, their roles responsibilities in the company, nature of industry in which the company operates and business model of the company by imparting suitable training sessions.

4. OVERVIEW OF FAMILIARIZATION PROGRAMME

Familiarization Programme for Independent Directors

As on 31st March, 2026, the Company has the following Independent Directors:

1. Ms. Nilu Nigania
2. Mr. Amit Kumar Agarwalla

The Board members have complete access to information within the Company. The Company periodically familiarizes its Directors, particularly Independent Directors, with the Company's business, operations, regulatory environment, and their roles and responsibilities.

1. At the Time of Appointment

At the time of appointment, Independent Directors are informed about their roles, duties, responsibilities, and the terms and conditions governing their appointment through a formal Letter of Appointment. They are also provided with an overview of the Company's business, operations, organizational structure, and business model, including an understanding of the Iron & Steel industry and the regulatory environment in which the Company operates.

Immediately upon appointment, Independent Directors are provided with the following documents and information to facilitate their familiarization with the Company:

- Annual Reports of the Company for the preceding three financial years;
- Criteria of Independence applicable to Independent Directors as prescribed under Regulation 16(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the provisions of the Companies Act, 2013;
- Copies of the Company's Code of Conduct for Directors and Senior Management Personnel, Code of Conduct for Prevention of Insider Trading, and other key governance and compliance policies;
- Relevant internal policies, procedures, and operational guidelines to enable them to familiarize themselves with the Company's practices and processes.

In addition, discussions are held with the Chairman, Managing Director, Chief Financial Officer, Company Secretary, and other senior management personnel to provide insights into the Company's operations, management structure, strategic objectives, and key business initiatives. Newly appointed Directors are also briefed on recent Board and Committee deliberations to facilitate their effective participation in Board proceedings.

2. Ongoing Familiarization and Updates

The Company regularly updates the Directors on business operations, financial performance, industry developments, regulatory changes, and other significant matters through presentations made during Board and Committee meetings or through separate interactive sessions conducted by the management team.

Such presentations generally cover:

- Industry outlook and market developments;
- Operational and financial performance of the Company;
- Business strategies and future plans;
- Budgets and capital expenditure plans;
- Risk management framework and mitigation measures;
- Corporate governance and compliance updates;
- Investor relations and shareholder grievances;
- Corporate Social Responsibility (CSR) initiatives;
- Business opportunities, mergers and acquisitions, and other strategic initiatives; and
- Any other matter relevant to the Company's operations and governance.

The Board members are also regularly apprised of significant amendments in applicable laws, regulations, and corporate governance practices to enable them to effectively discharge their responsibilities.

3. Interaction with Senior Management

Functional Heads and senior executives are invited to Board and Committee meetings, whenever required, to provide detailed insights into their respective areas of responsibility. These interactions enable Directors to gain a deeper understanding of the Company's business, operations, risks, opportunities, and governance practices.

The Company believes that such continuous familiarization enables Independent Directors to effectively discharge their duties and contribute meaningfully to the Board's deliberations and decision-making process.

Details of familiarization programs attended by our Independent Directors during the year 2025-26

In terms of the Familiarization Programme adopted by the Company, the Independent Directors were periodically updated on the business and operational developments of the Company through presentations and discussions at the meetings of the Board and its Committees during the Financial Year 2025-26.

The familiarization programmes covered, inter alia, the following areas:

1. **Business, Strategy & Emerging Developments**
2. **Governance, Compliance & Risk**
3. **Stakeholder Engagement & Responsibility**

These programmes enabled the Independent Directors to gain a deeper understanding of the Company's business environment, regulatory framework, strategic initiatives and governance practices, thereby facilitating their effective participation in the Board's decision-making process.

Name of the Directors	**No. of Programme / Meeting attended by the Independent Director**		**Number of hours spent by Independent Directors**	
	During the year ended 31.03.2026	**On a cumulative basis (From FY.2025-26 till 31.03.2026)**	**During the year ended 31.03.2026**	**On a cumulative basis (From FY.2025-26 till 31.03.2026)**
Ms Nilu Nigania	11	11	5.5	5.5
Mr. Amit Kumar Agarwalla	5	5	2	2
Ms. Chetna	5	5	6	6

- ***Ms. Nilu Nigania (DIN: 08203037) was appointed as the Independent Director of the Company with effect from 10th April, 2025.***
- ***Mr. Amit Kumar Agarwalla (DIN: 01779785) was appointed as the Independent Director of the Company with effect from 10th September, 2025.***
- ***Ms. Chetna (DIN: 08981045) resigned from the directorship of the company from the closure of business hours of 10.09.2025.***

Regular Familiarization Modules:

- Familiarization programmes are also proposed to be conducted on need basis during the term of the directors.
- The Board members are also made aware about the compliances applicable on the Company by way of quarterly compliances report.
- Independent Directors have the freedom to interact with the Company’s management during the Board/ Committee of Directors meetings or otherwise.

- Need Based training is provided to the Board Members on various matters. The Board Members based on their requirement attend various seminars, conferences, training programmes from time to time.

- Board Members are promptly updated on any change and new development with regard to relevant regulatory requirement such as SEBI regulations, Companies Act etc.

5. DISCLOSURE OF THE POLICY

The Policy shall be uploaded on the Company's Website for public information and a web link for the same shall also be provided in the Annual Report of the Company.

6. REVIEW OF THE PROGRAM

The Board will review this program and make revisions as may be required.

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