

RISK ASSESSMENT AND RISK MINIMISATION POLICY

Pursuant to revised Clause 49 applicable to all listed companies with effect from October 01 2014, every listed company

1. Shall lay down procedure to inform Board Members about the risk assessment and minimization procedure
2. The Board shall be responsible for framing, implementing and monitoring the risk management plan for the company.
3. The company shall also constitute a risk management committee. The board shall define the roles and responsibilities of the risk management committee and may delegate monitoring and reviewing of the risks management plan to the committee and such other functions as it may deem fit

PURPOSE:

The purpose of this policy and procedure is to ensure that risk identification and prevention is a core component of service delivery. It provides a framework for proactive, rather than reactive, risk management. That is, employees are encouraged to prevent adverse outcomes, as far as is reasonably practicable, by performing timely risk assessments. Effective risk management maximises opportunities for improvement and eliminates or minimises the risk of losses or harm as far as is reasonably practicable.

Risks are identified by considering what can happen and then why, where, when and how it can occur.

It is proposed to set up a committee for this purpose comprising of the following:

1. Mr. Ajay Bijli - Chairman
2. Mr. Sanjay Kapoor
3. Mr. Sanjai Vohra
4. Mr. Amit Burman
5. Mr. N. C Gupta
6. Mr. Nitin Sood
7. Mr. Gautam Dutta

The Committee will meet at reasonable intervals or when the need for the meeting is necessary. The minutes of the meeting shall be placed before the Board.

RESPONSIBILITY:

The implementation of the Risk assessment and risk minimisation policy is the responsibility of the Risk Management Committee.

RISK IDENTIFICATION AND PREVENTION PROCEDURE:

1. COMMUNICATE AND CONSULT

Communicate and consult with all internal and external stakeholders as appropriate at each stage of the risk assessment process. Follow up records (e.g. assessment records, evaluation forms) to assess the risk status of the company.

2. CONTEXT OF RISK

Establishing the context of the risk (e.g. attendance, theory component, and professional experience placement) provides the scope for the rest of the risk management process.

3. IDENTIFY RISK

Establish the context of the risk. The Risk Management Committee seeks to identify risks prospectively before they present challenges.

It is important to identify all risks at this stage as risks not identified are excluded from being further analysed and managed.

Risks might include, but are not limited to:

1. Risk(s) related to F & B, Company's patrons, their safety and security related issues etc.
2. The Indian box office is fairly seasonal in nature, with bigger releases and higher box office sales occurring during festival and holiday periods.
3. Moreover, occupancies may be affected adversely by major sports events, such as the Indian Premier league cricket tournament.
4. Piracy Violation of intellectual property rights pose a major threat to the Media and Entertainment companies.
5. Lack of quality content has emerged as a major concern because of the 'Quick-buck' route being followed in the industry.
6. With technological innovations taking place so rapidly, the media sector is facing considerable uncertainty about success in the market place.
7. Insurance covers for all the assets, properties of the Company.

RISK ANALYSIS:

This requires developing an understanding of risk. Consideration should be given to the sources of risk, including their positive and negative consequences.

Measures to assist this include:

- Identification of risks
- Establish the current management and actions that have been used to control known risks (what are we already doing about the risk).
- Determine the consequences of the current risk (extreme, high, moderate, low, negligible)
- Determine the likelihood of the current risk occurring (almost certain, likely, occasional, unlikely or rare)

RISK EVALUATION

Informs decision making about whether a risk can be eliminated or minimized by taking all reasonably practicable steps by comparing the levels of risk determined.

Consideration should include whether:

- the level of risk is so low that specific strategy can be advised for betterment
- the risk is such that there is no strategy is available
- the cost of strategy is unreasonably disproportionate compared to the benefit
- the opportunities presented outweigh the threats .

Risk that is regarded as unable to be eliminated or reduced by all reasonably practicable means must be actively managed, monitored and reviewed.

MONITORING AND REVIEW:

This is an essential component of the framework and creates a cycle of action and reflection and ongoing monitoring of risks and the effectiveness of risk treatment plans. Few risks remain static and regular review is essential to ensure that the management plan remains relevant. For this:

1. At board meeting, the risk register will be reviewed by the board as and when required.
2. New risks will be identified, the same are then assessed, and accordingly controls will be designed by the Risk Management Committee.
3. Put in place and enforced through the process owner and a fixed timeline will be set for achieving the same.

ROLES AND RESPONSIBILITIES:

Risk Management Committee: Should work in close collaboration with the HOD's, Coordinators, Manages, (where ever applicable) to identify risks concerned at the earliest. Random feedback from employees should be sought in informal way as an augmentation to the formal written feedbacks.

All Employees:

- Actively participate in the assessment, elimination, minimization and prevention of risks in the workplace as far as is reasonably practicable.
- Timely and accurate reporting of all incidents and near misses.
- Critically review study and work practices to identify opportunities for ongoing improvement.
- Demonstrate a commitment to own ongoing learning and development.

Under this framework risks are identified as per each process flow and control systems instituted to ensure that the risks in each business process is mitigated. The Risk Management Committee is responsible for the overall risk governance in the company and reports directly to the Management which consists of various functional heads.

The Board will review the risk management policy from time to time.