

ANNEXURE-A

Policy on Communication Between Those Charged with Governance and the Statutory Auditor

1. Objective

This Policy sets out a formal, robust, and regulatorily aligned framework governing communication between Those Charged with Governance (TCWG) and the Statutory Auditor in connection with the statutory audit of the financial statements. The Policy is designed to ensure compliance with Indian Standard on Auditing (SA) 260 (SA 260) and other applicable auditing standards, and to support effective oversight of the financial reporting and audit process.

The objectives of this Policy are to: -

- a) Establish clear, timely, and effective two-way communication between TCWG and the Statutory Auditor;
- b) Enable TCWG to discharge their oversight responsibilities over financial reporting, internal controls, and the audit process;
- c) Enable the Statutory Auditor to plan and perform the audit effectively; and
- d) Ensure that all significant audit matters are communicated in a timely, transparent, and documented manner.

2. Scope

This Policy applies to all statutory audits of the Company and governs communications between: the Statutory Auditor (including the Engagement Partner and other designated members of the audit team) and - Those Charged with Governance, including any other body or individual entrusted with governance and oversight responsibilities.

3. Definitions

- a) **Those Charged with Governance (TCWG)** means the Audit Committee.
- b) **Statutory Auditor** means a statutory auditor appointed in accordance with the provisions of the Companies Act, 2013.
- c) **Audit Committee** means the Audit Committee constituted by the Board of Directors.

4. Governing Principles

Communication between TCWG and the Statutory Auditor shall be governed by the following principles:

- a) **Timeliness:** Matters shall be communicated sufficiently early to enable TCWG to take appropriate action.

- b) Clarity and Precision: Communications shall be clear, specific, and free from ambiguity.
- c) Completeness: All matters required to be communicated under applicable auditing standards shall be covered.
- d) Two-way Engagement: Communication shall be interactive and not limited to one-way reporting.
- e) Proportionality: The form, detail, and frequency of communication shall be commensurate with the significance of the matter.

5. Responsibility for Communication

- a) Statutory Auditor

The Engagement Partner shall have primary responsibility for communication with TCWG. The Engagement Partner may delegate certain communications to senior members of the audit team, provided overall responsibility remains with the Engagement Partner.

- b) Those Charged with Governance

Communication on behalf of TCWG shall ordinarily be conducted through the Audit Committee or through Chief Financial Officer, for such matters as may be prescribed by the Audit Committee.

6. Manner and Mode of Communication

- a) Modes of Communication

Communication may be effected through one or more of the following modes, as appropriate:

- i. Formal written reports or letters;
- ii. Oral discussions or meetings;
- iii. Presentations at meetings of the Audit Committee or Board; and
- iv. Electronic communications, including email, where appropriate.
- v. Written and Oral Communication

Written communication shall be used for significant audit findings, auditor independence matters, and other matters where oral communication alone would be insufficient.

Oral communication may be used for planning discussions, interim updates, and clarifications, provided that such communication is appropriately documented.

7. Timing of Communication

TCWG and the Statutory Auditor shall communicate throughout the audit cycle, including:

- a) **Planning Stage:** Communication of auditor responsibilities, planned scope and timing of the audit, and significant risks identified.

- b) **During the Audit:** Communication of significant difficulties encountered, emerging issues, or matters requiring prompt attention.
- c) **Completion Stage:** Communication of significant audit findings, qualitative aspects of accounting practices, and matters affecting the auditor's report.
- d) **Ongoing / As Required:** Communication of auditor independence matters, going concern issues, fraud-related matters, or other significant issues as they arise.

8. Matters to Be Communicated

a) Auditor's Responsibilities

The Statutory Auditor shall communicate its responsibilities in relation to the audit, including the objective of expressing an opinion on the financial statements and the respective responsibilities of management and TCWG.

b) Planned Scope and Timing of the Audit

The Statutory Auditor shall communicate information regarding the overall audit strategy and approach, planned scope and timing of the audit; significant risks identified; and Application of materiality in planning the audit.

c) Significant Audit Findings

Significant audit findings to be communicated include:

- i. Qualitative aspects of significant accounting policies and practices;
- ii. Significant accounting estimates and judgments; -
- iii. Significant difficulties encountered during the audit;
- iv. Significant matters discussed with management;
- v. Circumstances that may affect the auditor's report; and
- vi. Other matters relevant to TCWG's oversight of financial reporting.

d) Auditor Independence

Where applicable, the Statutory Auditor shall communicate compliance with relevant ethical and independence requirements and safeguards applied to address identified threats and issues related to conflict of interest.

e) Other Matters

Other matters to be communicated, where relevant, include non-compliance with laws and regulations, instances of fraud, significant deficiencies in internal control etc.

9. Communication Matrix

The following matrix sets out the minimum communication requirements:

Audit Stage	Matter	Responsibility (Auditor)	Mode of Communication	Responsibility (TCWG)
Planning	Auditor responsibilities, scope, timing	Engagement Partner	Written / Presentation	Review and acknowledge
Planning	Significant audit risks	Engagement Partner	Written / Oral	Provide inputs, oversight
During audit	Significant difficulties / issues	Engagement Partner	Oral followed by written	Consider and respond
During audit	Emerging significant matters	Engagement Partner	Oral / Email	Timely discussion
Completion	Significant audit findings	Engagement Partner	Written report	Review, challenge, approve
Completion	Qualitative aspects of accounting	Engagement Partner	Written / Presentation	Evaluate judgments
Completion	Matters affecting auditor's report	Engagement Partner	Written	Oversight and action
Throughout	Auditor independence	Engagement Partner	Written	Evaluate and confirm

10. Two-Way Communication

TCWG shall communicate matters relevant to the audit, including strategic decisions, risks, and governance issues and provide timely responses to audit observations and recommendations, where necessary.

The Statutory Auditor shall evaluate whether communication with TCWG has been adequate and, where it has not, assess the implications for the audit and take appropriate action in accordance with applicable standards.

11. Review and Amendment

This Policy shall be reviewed periodically by TCWG to ensure compliance with applicable laws, regulations, and auditing standards. Any amendments shall be approved by the appropriate governance body.