

**Policy on Familiarization & Continuing
Education Programme of Independent Directors**

CASTLE TRADERS LIMITED

GLOSSARY

“Act” or “CA,2013”	means the Companies Act, 2013, to the extent notified, from time to time, and includes any re-enactment thereof, with all schedules and tables thereunder, as notified, with effect from the date of such notification in the official gazette of India including all rules, notifications, circulars, clarifications and orders issued thereunder.
“Board”	implies the Board of Directors of the Company
“Company”	implies Castle Traders Limited
“Directors”	implies the directors on the Board
“Executive Director or “ED”	implies Executive Director of the Company
“Independent Director” or “ID”	implies a non-executive Director of the Company and who is neither a promoter nor belongs to the promoter group of the company, and who satisfies other criteria for independence mentioned in the Companies Act, 2013 and the SEBI (LODR) Regulations, 2015, with the BSE Limited
“Key Managerial Personnel” or “KMP”	In relation to the Company, means the following key managerial personnel: <ol style="list-style-type: none">a. Managing Directorb. Chief Financial Officerc. the Company Secretaryd. Whole-time directore. Any such officer as prescribed by law
“Managing Director” or “MD”	implies the Managing Director of the Company
“Policy”	implies the policy on Independent Director Familiarization & Continuing Education Programme
“Senior Management”	Implies personnel of the Company who are members of its core management team excluding Board of Directors comprising all members of management one level below the executive directors, including the functional heads.

1. INTRODUCTION

This Policy on Familiarization and Continuing Education Program for Independent Directors of the Company is being adopted by the Board pursuant to Schedule IV of the Act, 2013.

2. PURPOSE AND OBJECTIVE OF THE POLICY

The Program aims to provide insights into the Company to enable the Independent Directors to understand its business in depth and contribute significantly to the Company.

3. FAMILIARIZATION AND CONTINUING EDUCATION PROCESS

- 3.1. The Company shall through its MD/EDs/KMPs conduct programs/presentations periodically to familiarize the Independent Directors with the strategy, operations and functions of the Company;
- 3.2. Such programs / presentations will provide an opportunity to the Independent Directors to interact with the Senior Management of the Company and help them to understand the Company's strategy, business model, operations, service and product offerings, markets, organization structure, finance, human resources, technology, quality, facilities and risk management and such other areas as may arise from time to time;
- 3.3. The programs/presentations shall also familiarize the Independent Directors with their roles, rights and responsibilities;
- 3.4. The Company may circulate news and articles related to the industry on a regular basis and may provide specific regulatory updates from time to time;
- 3.5. The Company may conduct an introductory familiarization program/presentation, when a new Independent Director comes on the Board of the Company. New Independent Directors shall meet with the Managing Director/Chairperson, Key Managerial Personnel and Senior Management to discuss the functioning of the Board and the nature of the operation of the Company's business activities.

4. REVIEW OF THE POLICY

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

5. COMPLIANCE RESPONSIBILITY

Compliance of this policy shall be the responsibility of the Company Secretary of the Company who shall ask for any information or clarifications from the management in this regard.
