

Citius TransNet Investment Trust **("Citius")**

Investment Manager: EAAA TransInfra Managers Limited

Risk Policy

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Policy Effective Date	April 17, 2026
Policy Reference	Resolution No.5
Policy Owner	Chief Investment Officer
Approved by	Risk Management Committee

1. Introduction

The objective of the Risk Policy (the “Policy”) is to provide guidance regarding the management of risk to support the achievement of business objectives. The Policy also enables a proactive approach in identifying, evaluating, reporting, and managing risks associated with the business.

The Policy also addresses the requirements of regulation 26G of the InvIT Regulations, read with Regulation 17 (9) and Regulation 21 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”). The Policy also addresses the requirements under Section 134(3)(n) of the Companies Act, 2013, which requires the Board of Directors to develop and implement a risk management policy. The policy is framed by EAAA TransInfra Managers Limited (ETML), the “Investment Manager” (IM) of Citius TransNet Investment Trust (“Citius”) or (“Trust”) or (“InvIT”), an infrastructure investment trust registered with the Securities and Exchange Board of India (“SEBI”) in accordance with the SEBI (Infrastructure Investment Trusts) Regulations, 2014, as amended (“InvIT Regulations”).

2. Applicability

This Policy is applicable to Citius from the date of issue of this policy and to existing and future portfolio assets acquired by the Trust, as adopted by them from time to time.

3. Risk Management Philosophy

Citius’ philosophy is that the Risk Management is an “individual responsibility” and “collective responsibility”, and each employee / entity should believe in identifying; and owning the risk, with the end objective of achieving stable and sustainable growth.

4. Governance and Oversight Structure

The structure for effective implementation of this Policy is as below :



5. Enterprise Risk Management Framework

The Enterprise Risk Management Framework (the “ERM Framework”) for effective adoption and implementation of this Policy is depicted below:

Risk Identification	<ul style="list-style-type: none">• Risk identification is the mechanism of identifying exposure to uncertainty across the business. This involves identifying those events, occurring internally or externally, that could affect achievement of the objectives
Risk Assessment and Evaluation	<ul style="list-style-type: none">• Involves quantification of the impact of risks to determine potential severity and probability of occurrence, measures the relative importance of each risk and enables decision making and allocation of resources in line with organisational priorities
Risk Treatment	<ul style="list-style-type: none">• Determine actions to mitigate risks, select one or more options for managing risks, assign accountabilities for implementing such actions and determine monitoring activities and metrics
Risk Recording	<ul style="list-style-type: none">• Recording of risks in a risk register across all risk categories are captured, along with risk mitigation plans
Risk Monitoring and Reporting	<ul style="list-style-type: none">• Aggregate risk information and share with stakeholders as per governance structure

6. Integrating risk into business

Successfully embedding risk management into governance and working practices is vital to the overall effectiveness of the Policy. It requires to consider actively the ways in which one acts, behaves, and articulates risk to ensure that risk management becomes a core element of the culture.

A strong risk culture evolves to accommodate the structures, responsibilities and processes described in this Policy so that the risks identified do not result in a financial or reputational loss to the entities covered by this Policy.

7. Key roles and responsibilities

- **Board of Directors (Board)** - The Board shall constitute and define the roles and responsibilities of the Risk Management Committee. The Board may delegate monitoring and reviewing of the risk management plan to the Risk Management Committee and such other functions as it may deem fit including cyber security.
- **Risk Management Committee (“RMC”)** - The RMC constituted by the Board shall assist the Board in:
 - Formulating the Risk Policy.
 - Ensuring appropriate methodologies and processes to monitor and oversee implementation of this Policy.
 - Evaluating the adequacy of risk management systems and evaluate risks associated with the business of the entities covered by this policy as per the Framework laid down by the Board of Directors.
- **Enterprise Risk Council (“ERC”)** - The council may include representatives / nominees of the Investment Manager, Project Manager (“Epic TransNet Project Management Private Limited”) and Sponsor (“Epic TransNet Infrastructure Private Limited”), as approved from time to time by the Board. The ERC shall assist the RMC in:
 - Oversight for implementation of the Policy and the Framework.
 - Arrive at top priority risks to be escalated to Board or RMC at least once in six months.

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- **Risk Coordinator(s)** - The Risk Coordinator(s) can be identified from RMC, ERC or from IM as per mutual discussions. The Risk Coordinator (s) will:
 - Work closely with ERC for effective implementation of Risk Policy / Framework.
 - Be the primary point of contact for the Risk Owners.
 - Facilitate in effective adoption of Risk Policy and/or ERM Framework and the reporting of risks to ERC / RMC.
- **Risk Owner** - Risk Owner has the accountability and responsibility to manage a risk and manage impact of residual risks and take appropriate measures to monitor and control the same.

8. Communication of this Policy

This Policy shall be posted on the website of the Trust.

9. Review of the Policy

This Policy will be reviewed and reassessed by the Board of the Investment Manager as and when required and appropriate recommendations shall be made by them to update and amend this Policy based on changes that may be brought about due to any regulatory amendments or otherwise.

10. Conflict with Applicable Law

In the event of any conflict between applicable law, including the Companies Act, the SEBI InvIT Regulations or the SEBI Listing Regulations or any other statutory enactments and the provisions of this Policy, applicable law shall prevail over this Policy.

Adopted by the board of directors of EAAA TransInfra Managers Limited on behalf of the Trust on April 17, 2026.