J.K.SHAH COMMERCE EDUCATION LIMITED

FAMILIARIZATION PROGRAM FOR INDEPENDENT DIRECTORS

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The role of independent directors has been of paramount importance to the corporate world, its investors, stakeholders, regulators as these directors are required to uphold ethical standards of integrity and exercise independent judgement to assist in implementing the best corporate governance practices, while fulfilling the strict criteria of being independent of the management and the company. Hence, it becomes imperative on the part of a company to adequately familiarize independent directors with the company, its operations, management, and regulatory framework governing the organization.

As per Regulation 25(7) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (the "**SEBI Listing Regulations**"), every listed entity shall familiarize the independent directors about their roles, rights, responsibilities in the company, nature of the industry in which the company operates, business model of the company, and any other relevant information, through various programmes.

As per Regulation 46(2)(i) of the SEBI Listing Regulations, the listed entity shall disseminate the details of familiarization programmes imparted to independent directors under a separate section on its website. The following is an indicative list of the details to be included:

a) Number of programmes attended by independent directors (during the year and on a cumulative basis till date);
b) Number of hours spent by independent directors in such programmes (during the year and on a cumulative basis till date); and
c) Other relevant details.

As per '**Schedule IV' of the Companies Act, 2013** i.e., '**Code for Independent Directors**', the independent directors shall undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company. Independent directors must strive to attend the general meetings of the company; keep themselves informed about the external environment in which the company operates; and report concerns about unethical behaviour or any suspected/ actual violation of the company's code of conduct or ethics policy etc.

1. SCOPE

In view of the same, this "**Familiarization Program for Independent Directors**" of J.K.Shah Commerce Education Limited (the "**Company**") has been framed to provide insights into the Company and to enable the Independent Directors to understand the Company's business in depth that would facilitate their active participation in managing the Company as also the regulatory requirements in compliance with Regulation 25(7) of the SEBI Listing Regulations and 'Schedule IV' of the Companies Act, 2013.

2. OBJECTIVES

Through the Programme, the Company aims to achieve the following objectives:

(a) Familiarize the Independent Directors with the Company, its business model; nature of the industry in which the Company operates; roles, rights, responsibilities of Independent Directors in the Company;
(b) To inform them of all the laws, rules, regulations and guidelines applicable to the Company; and
(c) To facilitate informed and constructive participation by Independent Directors in matters placed before the Board and its Committees.

3. FAMILIARIZATION PROCESS

The Company shall through its Executive Directors, Key Managerial Personnel and/or Senior Management Personnel conduct detailed programs / presentations periodically to familiarize the Independent Directors with the strategy, operations and functions of the Company.

The program essentially has two broad components - technical and behavioural. The technical component shall enable the participants to understand Company business, strategies, industry dynamics, its footprint in the market, its growth plans and prepare them for an active role in Company. The behavioural component shall empower the participants to understand board procedures and help them to be effective in board activities. The program also aims to offer a conceptual framework based upon current expectations which require the Independent Directors to adhere to a code and standard of ethics and integrity for fulfilment of their responsibilities in a professional and faithful manner to promote confidence of the investor community particularly minority shareholders, regulatory authorities and the stakeholders at large.

The Programme shall be conducted in such a manner as to facilitate the participation and convenience of the Independent Directors and enable them to attend the same in view of their busy schedules.

The Company may conduct an induction or introductory familiarization programme for every newly appointed Independent Director.

4. DISCLOSURE

The policy for Familiarization Program for Independent Directors shall be uploaded on the Company's website for public information and a web link for the same shall also be provided in the corporate governance section in the annual report of the Company.

Details of familiarization programmes imparted to independent directors, including the following details, shall also be disclosed under a separate section on the website of the Company.

(a) Number of programmes attended by independent directors (during the year and on a cumulative basis till date);
(b) Number of hours spent by independent directors in such programmes (during the year and on cumulative basis till date); and
(c) Other relevant details.

5. REVIEW OF THE PROGRAMME

The Board may from time to time review the Familiarization Program for Independent Directors and may revise the same as and when required to adopt the best practices in the industry.

6. EFFECTIVE DATE

The policy for Familiarization Program for Independent Directors shall be effective from October 5, 2026, being the date of its approval by the Board of Directors.

In the event of any conflict between the provisions of this Policy and any applicable law, including the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the provisions of such applicable law shall prevail. Any subsequent amendment/modification to the Applicable Law shall automatically apply to this Policy.