



VIGIL MECHANISM/ WHISTLE BLOWER POLICY

CHAMAN METALLICS LIMITED



GROUP
Benchmark of quality



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Version	Date	Particulars
01	17-August-2022	Originally Adopted.
02	22-March-2023	Updated

1. PURPOSE OF THE POLICY

1.1 Chaman Metallics Limited (“CML”) is committed to complying with all laws and regulations that apply to them, satisfying the Company’s Code of Conduct and Ethics, and particularly to assuring that business is conducted with integrity and that the Company’s financial information is truly and fairly presented. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, the Company and those working for or on behalf of, or with the Company could face governmental investigation, prosecution, fines, and other penalties that could cost to the company and concerned person financially and operationally. Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies as well as applicable laws. Directors, employees or any other person including vendors, contractors, subcontractors, consultants, trainees, shareholders, former employees, job applicants and any other third parties (collectively referred hereinafter as “Stakeholder(s)”) must be able to raise concerns regarding such potential violations easily and free from any fear of retaliation. That is the purpose of this policy (the “Policy” or the “Vigil Mechanism / Whistle Blower Policy”). You are required to read this Policy and submit the attached certification that you will comply with it.

1.2 All the Stakeholder(s) are required to report actual or suspected reportable matter of applicable laws and regulations and the Code of Conduct, and GRMSPL has an obligation to ensure that there is a procedure in place to



enable the reporting of such violations.

2. TERMS AND DEFINITIONS

2.1 **“Protected Disclosure”** means the disclosure of a Reportable Matter in accordance with this policy.

2.2 **“Reportable Matter”** means a genuine concern with respect to actual or suspected:

- i. fraudulent practices, such as improperly tampering with GRMSPL’s books and records, or theft of company property;
- ii. corruption, including bribery and money laundering;
- iii. breaches of the Code of Business Conduct and Ethics.

Provided that, complaints concerning personal grievances, such as professional development issues or Employee compensation, are not to be considered as Reportable Matters for purposes of this Policy.

2.3 **“Retaliation”** includes adverse actions, harassment or discrimination relating to your reporting of actual or suspect protected disclosure.

2.4 **“Registered Office”** means Registered Office of the Company currently situated at A-26, M.I.D.C, Tadali Growth Centre, Tadali, MH 442406 or any other location as shifted from time to time

2.5 **“Corporate Office”** means Corporate Office of the Company currently situated at Agrawal Complex, Opp. Pandey Nursing Home, Samta Colony, Raipur (C.G) 492001 or any other location as shifted from time to time.

3. DUTY TO REPORT

3.1 Everyone is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company’s Code of Conduct and Ethics. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations,



insider trading, leak of unpublished price sensitive information, bribery, or violations of the anti-retaliation aspects of this Policy. Refer the Company's Code of Conduct and Ethics for a more detailed description of potential violations and other areas of particular concern.

- 3.2 Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws. You should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy.
- 3.3 Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.
- 3.4 This Policy applies to all Stakeholder, regardless of their location. Violations will result in appropriate disciplinary action. The Stakeholder(s) are required to familiarize themselves with this Policy, and seek advice from their Concerned Head of Department, HR Team, Compliance Officer and/or Chairman of Audit Committee of GRSPL if any questions arise.
- 3.5 Reporting should be made pursuant to the reporting mechanism as prescribed under clause 4.
- 3.6 Reporting is limited to making a Protected Disclosure. Stakeholder(s) should not engage in investigations concerning a Reportable Matter that is the subject of a Protected Disclosure. Neither should a Stakeholder(s) become involved in determining the appropriate corrective action that might follow from the submission of a Protected Disclosure.



4. REPORTING MECHANISM

Reporting shall be made by Stakeholder(s) in following manner:

- i. via e-mail to info@cmlgrgroup.com
- ii. via telephone to 0771-4259100.
- iii. via physical letter address to the Concerned Head of Department and/or HR

Team, marked as “Private and Confidential”, and delivered at the registered office or corporate office of the company.

Moreover, in exceptional cases, Stakeholder(s) have the right to make reporting directly to the Compliance Officer and/or Chairman of Audit Committee.

- i. via e-mail to cs@cmlgrgroup.com or 1SumitDahiya@gmail.com.
- ii. via physical letter address to the Compliance Officer and/or Chairman of Audit Committee, marked as “Private and Confidential”, and delivered at the registered office or corporate office of the company.

As stakeholder(s) have several means of reporting, one never need to report to someone you believe may be involved in the suspected violation or from whom you would fear retaliation.

Your reporting should include as much information about the suspected violation as you can provide. Where possible, it should describe (including but not limited to):

- a. the nature of the suspected violation;
- b. the identities of persons involved in the suspected violation;
- c. relevant factual background;
- d. a description of documents that relate to the suspected violation; and



- e. the time frame during which the suspected violation occurred.

5. PROTECTION OF STAKEHOLDER(S)

There shall not be any adverse action against any Person for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation of any law, this Policy, or the Company's Code of Conduct and Ethics. The Company takes reports of such retaliation seriously. Incidents of retaliation against any Person reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting stakeholder(s) may also be subject to civil, criminal & administrative penalties as the Board may think fit.

6. MODIFICATION/AMENDMENT OF THE POLICY

The Audit Committee or the Board of Directors of GRMSPL can modify this Policy unilaterally at any time without any notice. Modification may be necessary, among other reasons, to maintain compliance with applicable laws and / or to accommodate organizational changes within the Company.

7. CONFLICTS OF INTEREST

- 7.1 Where a Protected Disclosure concerns any person of the Concerned Head of Department, HR Team, Compliance Officer and/or Chairman of Audit Committee as the case may be, that person shall be prevented from acting in relation to that Protected Disclosure.
- 7.2 In case of doubt, the Chairman of the Board of Directors shall be responsible for determining whether a person must recuse himself or herself from acting in relation to a Protected Disclosure.



8. ACKNOWLEDGMENT

Please sign the acknowledgment form below and return it to Human Resources Team. This will let the Company know that you have received the Vigil Mechanism / Whistle Blower Policy and are aware of the Company's commitment to a work environment free of retaliation for reporting violations of any Company policies or any applicable laws.



ACKNOWLEDGMENT AND AGREEMENT REGARDING THE WHISTLEBLOWER POLICY

This is to acknowledge that I have received a copy of the Company's Vigil Mechanism / Whistleblower Policy. I understand that compliance with applicable laws and the Company's Code of Conduct and Ethics is important and, as a public company, the integrity of the financial information of the Company is paramount. I further understand that the Company is committed to a work environment free of retaliation for employees who have raised concerns regarding violations of this Policy, the Company's Code of Conduct and Ethics or any applicable laws and that the Company specifically prohibits retaliation whenever an employee makes a good faith report regarding such concerns. Accordingly, I specifically agree that to the extent that I reasonably suspect there has been a violation of applicable laws or the Company's Code of Conduct and Ethics, including any retaliation related to the reporting of such concerns, I will immediately report such conduct in accordance with the Company's Vigil Mechanism / Whistleblower Policy. I further agree that I will not retaliate against any employee for reporting a reasonably suspected violation in good faith.

I understand and agree that to the extent I do not use the procedures outlined in the Vigil Mechanism / Whistleblower Policy, the Company and its officers and directors shall have the right to presume and rely on the fact that I have no knowledge or concern of any such information or conduct.

Stakeholder's signature

Stakeholder's Name

Date: