

TVS SRICHAKRA LIMITED

WHISTLE BLOWER POLICY

Objective

- a) To provide for safe avenues for all Directors and permanent employees to raise concern when violations take place directly or indirectly, intentionally or otherwise, which would bring disrepute to the strong edifice built by TVS Srichakra Limited, on the foundations of high standards of integrity, dedicated customer service, fair business practices, efficient, safe and trusted financial policies, highest levels of compliance with all applicable laws in letter and spirit.
- b) To provide necessary safeguards for protection to Directors and permanent employees from victimization for whistle blowing in good faith

Applicability

This policy shall be applicable to all permanent employees and Directors of the Company.

Main features of Whistle Blowing

- 1) To be used for : Reporting any serious actual or suspected frauds, concerns relating to financial matters / reporting, leak of UPSI information, unethical or illegal conduct or actual or possible violation of Code of Conduct / Ethical Standards; actions which are not in line with the applicable company policies, actions which would affect the Company's image or reputation, actions which are in the nature of harassment or actions that would amount to serious improper conduct.

- 2) **Whistle Blowers**

A Director / Permanent Employees making disclosure under this policy is referred to as "Whistle Blower" or "Complainant". The Whistle Blower has to demonstrate or provide sufficient grounds for his / her concern but should not make any malicious allegations which would result in disciplinary action.

- 3) **Whom to Report**

The complaining employees should submit the report raising the concern either to (a) the Head – Personnel or (b) the Company Secretary or can send an email to Ombudsman at whistleblower@tvstyres.com with a copy to any of the above Officers (called Access Persons). If the complaint is either against any one of the Access Persons, then it can be made to the Managing Director of the

Company. If the complaint is against the Managing Director, it can be made to the Chairman of the Audit Committee of the Company. Directors when they blow the whistle, they should send the complaining report to the Chairman of the Audit Committee.

4) **When to Report**

The Complainant shall raise the issue immediately / promptly but within a reasonable period of the event / action / finding but not later than two months.

Any complaining employees having any information or knowledge regarding the existence of any violation or suspected violation of the Insider trading Code with respect to leak of UPSI information can report the violation or suspected violation.

5) **How to Report**

The report should include as much information about the suspected violation. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. The complainant may be required to give further information.

6) **Making a protected disclosure**

Any eligible person covered by this policy may make a Disclosure in writing, duly addressed to the Ombudsman or to the Audit Committee (in case the disclosure pertains to Managing Director or the Ombudsman) as early as possible, but not later than 45 consecutive days after becoming aware of the issue, through email.

Whistle Blower must put his / her name to allegations, for timely resolution of the issue and for ensuring that adequate protection is granted to him / her under the policy. No anonymous allegation will be entertained.

The written disclosure must ensure the following

- Disclosure to be typed or written in legibly either in English or Hindi or in regional language of place of employment.
- Clear understanding of the issue is brought out
- Actual facts are explained in the issue, and it is not merely speculative
- Specific information is provided to the maximum extent to allow conduct of investigation

- Financial or other impact (if any) to be detailed.
- In case the issue was previously brought out, outcome of the same.

Contact Details

Ombudsman
Audit Committee Chairman

7) **Investigation**

All reports under this Policy will be investigated promptly either by the Access Persons or any Committee formed in this regard by the Access Persons. Immediately on receipt of the Complaint, an acknowledgement will be given to the complainant. Based on a thorough examination of the findings, the Access Persons of the Committee formed in this regard shall submit the Report to the Managing Director / Audit committee.

If, at the conclusion of its investigation, the company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. Reasonable and necessary steps will also be taken to prevent any further violations.

8) **Safeguards against victimization**

- i) No adverse action shall be taken or recommended against a Complainant in retaliation to his blowing the whistle. Harassment / victimization of the Complainant will constitute sufficient ground for dismissal of the concerned employee
- ii) Source of information to the complainant shall be disclosed to facilitate investigation
- iii) Every effort will be made to protect the complainant's identity subject to any legal constraints that may arise from time to time