

## **LGB FORGE LIMITED**

### **WHISTLE BLOWER POLICY**

#### **A. Purpose:**

As a part of the Company's integrity, the Company follows the outlined whistleblower policy which is designed to allow the complainant / whistleblower to give voice to his / her concerns without any fear of reprisal / victimization from the superiors / management.

#### **B. Scope:**

The whistleblower can be any stakeholder, whether employee, dealer, vendor, customer, shareholder, contractors and their personnel and other connected persons. Provided that such personnel do not have ongoing or anticipated claims or legal proceedings or any other litigation on the Company.

Further, all such complainants whose associates, relations, direct or indirect family members who have any such arbitration with the Company are not eligible to complain under this Policy.

#### **C. Definitions:**

##### **(i) Whistleblower:**

Any employee, director or officer of the Company who makes a disclosure of any observed unethical activity.

##### **(ii) Audit Committee:**

A Committee constituted by the Board of Directors of the Company, consisting of some of the members of the Board of Directors.

##### **(iii) Investigation Committee:**

Will consist of a team (3-member team) appointed by the Audit Committee to conduct the investigation of the complaint registered / report submitted by the Whistle Blower.

##### **(iv) Unethical Activity / Misconduct:**

Violation of laws, infringement of the Company's Code of Conduct or related policies, any instances of leak of Unpublished Price Sensitive Information, misappropriation of funds, fraud or misrepresentation.

##### **(v) Leak or Suspected Leak of UPSI:**

It shall refer to such act / circumstance(s) by virtue of which an Unpublished Price Sensitive Information is made available or becomes available, by any means or mode to any person, association, body, firm, agency, society, entity or to a group thereof, whether registered or otherwise before its official publication or announcement or formal circulation in public domain and which shall also include any purported attempt thereof.

#### **D. Coverage of the Policy:**

The whistleblower may complain on the following areas only within the premises of the Company.

- Incorrect financial reporting.
- Leak of Unpublished Price Sensitive Information.
- Moral Standards not being maintained.
- Not in line with Company Policy.
- Detrimental to the Image of the Group.
- Violated the accepted values of the Group.
- Illegal in nature and substance.
- Improper conduct
- Serious Improper Conduct (including any kind of harassment).

This Policy applies to all Directors, full-time employees and employees on temporary assignments.

#### **E. Procedure for Reporting Unethical Activity / Misconduct:**

Report / complaints of unethical activity / misconduct would need to be in writing with a clear explanation of the activity or misconduct. The report needs to be factual with specific instances as examples and an approximate timeline of the activities. The report / complaint would need to be made within 30 days of observing the unethical activity and if desired can be reported anonymously.

The reporting procedure would be to send a report / complaint to the Audit Committee through an email addressed to [REDACTED].

In appropriate or exceptional cases, whistle blower shall have direct access to the Chairperson of the Audit Committee.

#### **F. Investigation Procedure and Action:**

Audit Committee will appoint an Investigation Committee consisting of 3 members within 5 working days of receiving the report from the whistleblower.

The Investigation Committee will examine the Whistleblower report and related details / documents and will also conduct necessary discussion to collate all relevant information.

The Investigation Committee shall take all reasonable measures to ensure that the report is submitted within 4 calendar weeks of being appointed, or such extended time as may be granted by the Audit Committee.

An Investigation report prepared at the end of the investigation by the Investigation Committee should be submitted to the Audit Committee.

The Audit Committee will forward the investigation report along with its observation to the Board of Directors for further action. The Board of Directors shall review the investigation report and the observations from the Audit Committee and recommend action to be taken.

**G. Confidentiality:**

The Proceedings shall be carried out in strict confidentiality in an unbiased manner and shall ensure through fact finding. The Whistle Blower Complainant and every internal and external stakeholder involved in the process shall:

- a. Maintain complete confidentiality / secrecy of the matter.
- b. not discuss the matter in any informal / social gatherings / meetings.
- c. Not to keep papers unattended anywhere at any time.
- d. Keep the electronic mails / files under password.

**H. Safeguarding the Interest of the Whistle Blower:**

The Company will not tolerate harassment or victimization and will take action to protect the whistle blower (complainant). The Company assures every whistle blower, protection against unfair termination or any other disciplinary action or unlawful discrimination or retaliation in any manner for blowing the whistle under this policy. The Company will do its best to protect whistle blower's identity when he / she makes a complaint. It must be appreciated, however, that the investigation process may require a statement by the whistle blower as part of the evidence.

**I. Malicious Allegations:**

The intent of the policy is to bring genuine and serious issues to the core. Allegations based not on reality but due to malicious intent will result in serious consequences and strong disciplinary action against the complainant concerned.

**J. Amendments:**

This Policy may be amended from time to time by the Board.

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*(The amendments to this policy have been approved by the Board of Directors, at their meeting held on 07 May 2025 and the same has been made effective from that date).*