ALLICON CASTALLOY LTD.

VIGIL MECHANISM / WHISTLE BLOWER POLICY

1. Object

The Company is committed to conducting its business in accordance with the highest standards of business ethics, openness, probity and accountability. The Company is opposed to, and takes seriously, any unethical or unlawful conduct by any of its employees. To that end, any evidence of malpractice or impropriety will be treated by the Company with utmost seriousness.

An important aspect of accountability and transparency is a mechanism to enable Stakeholders of the Company to voice concerns in a responsible and effective manner. It is a fundamental aspect of every contract of employment that an employee shall faithfully serve his or her employer, shall not misuse his or her position in the organization and shall not disclose confidential information about the employer’s affairs to his or her advantage.

Nevertheless, where an individual discovers information, which prima facie shows any malpractice or wrongdoing within the organization, then this information should be disclosed internally without fear of reprisal. The Company has endorsed the provisions as set out below so as to ensure that no Stakeholder should feel at a disadvantage in raising legitimate concerns. It is emphasized that these guidelines are intended to assist those Stakeholders, who believe that they have discovered malpractice or impropriety in the organization, and provide them with a secure, transparent and confidential mechanism for reporting the same. However, it should be noted that the whistleblower policy is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters, which have already been addressed under harassment, complaint, disciplinary or other procedures.

2. Definitions

The definitions of some of the key terms used in this Policy are given below:

a. “Audit Committee” means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013 and rules made thereunder, read with SEBI LODR, 2015 & amendments thereof.

b. “Disciplinary Action” means any action taken on the completion of or during investigation proceedings, which inter alia includes a warning, imposition of fine, suspension from official duties or any such other action as is deemed fit considering the gravity of the situation.

c. “Disclosure” means any communication made in good faith that discloses or demonstrates unethical or improper activity including activities mentioned in Clause 3 of this Policy.

d. “Stakeholder” means:

i) any employee of the Company (whether working in India or abroad);
ii) Directors of the Company including Managing Director and Executive Directors, if any;
iii) customers, contractors and third-party intermediaries engaged by the Company, such as agents and consultants;
iv) authorised representatives of recognized unions of employees of the Company.

e. “Investigators” means those persons authorized, appointed, consulted or approached by the Chief Executive Officer or the Chairman of the Audit Committee and include the auditors of the Company and the police.

f. “Whistle Blower” means Stakeholder making a Disclosure under this Policy.

3. Scope

This Whistleblower Policy is designed to enable the Stakeholders of the Company to raise concerns internally and bring the information to the notice of the appropriate authority, any information which an individual believes shows malpractice or impropriety, which could affect the business or reputation of the Company. Any allegations, which fall within the scope of the concerns identified below, will always be seriously considered and investigated. These concerns would include but not be restricted to:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation or statutes;
- Dangers to health & safety of the employees or the environment;
- Criminal activity;
- Unethical practices/lack of appropriate professional standards in breach of the Company’s Code of Conduct;
- Corruption;
- Discrimination;
- Harassment, whether vertical or horizontal;
- Abuse of authority;
- Negligence causing substantial and specific danger to public health and safety;
- Any other imprudent event; and

• Deliberate concealment of any of the above.

This Policy shall not cover issues arising out of personal employment situations. The Whistle Blower's role is that of a reporting party with reliable information. He or she is not required or expected to act as an investigator or finder of facts, nor is he or she expected to determine the corrective or remedial action that may be warranted in a given case.

Whistle Blowers should not act on their own in conducting any investigative activities nor do they have a right to participate in any investigative activities other than as requested by the person investigating the matter.

4. Guiding Principles

To ensure that this Policy is adhered to and to assure timely action, the Company will:

i) Ensure that the Whistle Blower is not victimized for making a Disclosure;

ii) Treat any form of retaliation, discrimination or victimization as a serious matter, including initiating disciplinary action against responsible person(s);

iii) Ensure complete confidentiality;

iv) Not conceal any evidence of the Disclosures;

v) Take disciplinary action, if anyone destroys or conceals evidence of the Disclosure made;

vi) Provide an opportunity to be heard to the persons involved, especially the person against whom the complaint is made.

5. Safeguards

a) Protection : The Company will offer protection to those Stakeholders who disclose such concerns, provided the Disclosure is made –
· in good faith;
· in the reasonable belief of the individual making the Disclosure that it tends to show malpractice or impropriety; and
· to an appropriate person.

No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Disclosure under this Policy. Complete protection will, therefore, be given to a

Whistle Blower against any unfair practice like retaliation, threat or intimidation, including the threat of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like, as well as any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions, including making any further Disclosures. The Company will take steps to minimize any difficulties which the Whistle Blower may experience as a result of making a Disclosure.

The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law.

Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

While it will be ensured that a genuine Whistle Blower is accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant Disciplinary Action. Protection under this Policy would not mean protection from Disciplinary Action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a malafide intention.

b) Confidentiality : The Company will treat all such Disclosures in a confidential and sensitive manner. The identity of the Whistle Blower shall be kept confidential to the fullest extent possible and feasible. However, the investigation process may reveal the source of the information, and the individual making the Disclosure may be required to provide a statement as part of the evidence gathered and if required, to participate in any investigation proceedings.

6. Anonymous Allegations

The organization will encourage individuals to put their names to any Disclosure they make. Disclosures made anonymously are much less credible, but it may be considered at the discretion of the Audit Committee.

In exercising this discretion, the following factors may be taken into account :

- The seriousness of the issues raised;
- The credibility of the Whistle Blower's Disclosure;
- The probability of confirming the Disclosures from attributable sources.

7. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. However, a Whistle Blower who makes any Disclosures, which have been subsequently found to be mala fide or malicious, or Whistle Blowers who make three or more Disclosures, which have been subsequently found to be frivolous, baseless or reported otherwise than in good faith, disciplinary action may be taken against such individual.

8. Procedure for making a Disclosure:

1) Individuals must raise their concerns to the Chief Executive Officer, who will act as the investigative officer of the Company. The Chief Executive Officer has been authorized by the Board of Directors and the Audit Committee of the Company for the purpose of receiving all complaints under this Policy and in ensuring appropriate action is taken. The Chief Executive Officer of the Company may pass on the complaint to any other appropriate person (Investigators), if he feels that such person can more appropriately investigate the complaint without any conflict of interest.

2) All Disclosures concerning matters relating to the working Directors of the Company should be addressed to the Chairman of the Audit Committee for investigation. The Chairman of the Audit Committee may pass on the complaint to any other appropriate person (Investigators), if he feels that such person can more appropriately investigate the complaint without any conflict of interest.

3) (i) The contact details of the Chief Executive Officer are as under:

Mr. Sumit Bhatnagar,
1426, Village Shikrapur, Taluka Shirur
Dist. Pune, Maharashtra
e-mail: sb@alicongroup.co.in

(ii) The contact details of the Chairman of the Audit Committee are as under:

Mr. Ajay Patil
email: ajay.shriram.patil@gmail.com

4) If a Disclosure is received by any employee of the Company other than the Chief Executive Officer of the Company / Chairman of the Audit Committee, the same should be forwarded to the Chief Executive Officer of the Company or the Chairman of the Audit Committee for further appropriate action. Appropriate care will be taken by such employee to keep the identity of the Whistle Blower confidential.

5) All Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should be either typed or written legibly. Though the

Whistle Blower is not expected to prove the allegation, he or she needs to demonstrate that there are prima facie sufficient grounds for concern.

6) Disclosures shall be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for a proper assessment of the nature and extent of the concern.

9. Investigation Procedure

a) All Disclosures reported under this Policy will be thoroughly investigated by the Chief Executive Officer of the Company/ Chairman of the Audit Committee. The Chief Executive Officer of the Company/ Chairman of the Audit Committee may at his or her discretion appoint any Investigator for the purpose of assisting him.

b) The decision to conduct an investigation taken by the Chief Executive Officer / Chairman of the Audit Committee is by itself not an accusation and is to be treated as a neutral fact-finding process without any presumption of guilt, as the outcome of the investigation may not support the conclusion of the Whistle Blower that an improper or unethical act was committed.

c) If initial enquiries by the Chief Executive Officer of the Company / Chairman of the Audit Committee indicate that the Disclosure made by the Whistle Blower has no basis or is not a matter to be pursued under this Policy, it may be dismissed at this stage and the decision documented. The complainant shall be informed of this decision at this stage.

d) Where the initial enquiries indicate that further investigation is necessary, then a formal investigation will be carried out by the Chief Executive Officer of the Company, who may at his or her engage outside auditors, counsel or other experts to assist in the investigation and analysis of the results.

e) The identity of the Whistle Blower and the person against whom the complaint has been made will be kept confidential to the extent possible given the legitimate needs of law and the investigation.

f) The person against whom the complaint has been made should be informed of the allegations at the outset of a formal investigation and the said person shall be given an opportunity to provide his/her inputs during the investigation.

g) The person against whom a complaint is made shall have a right to consult with a person or persons of his/her choice, other than the parties involved in, or tasked with conducting, the investigation under this Policy.

h) The person against whom a complaint has been made shall not interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be influenced, coached, threatened or intimidated by such person.

i) A judgment concerning the Disclosure and its validity will be made by the Chief Executive Officer/ Chairman of the Audit Committee. This judgment will be in a written report containing the findings of the investigations and reasons for the judgment. The report will be passed to the Audit Committee.

k) The investigation shall ordinarily be completed within 60 days of the receipt of the Disclosure.

l) If a complaint is shown to be justified, the management of the Company in consultation with the Audit Committee shall decide what Disciplinary Action to impose or what other appropriate Company procedures to invoke, and shall also take preventive measures to stop recurrence of the incident(s) complained of in the future.

m) The Whistle Blower should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

n) If the Whistle Blower is not satisfied that his concern is being properly dealt with by the Investigator assigned, he/she has the right to raise it in confidence with the Chief Executive Officer or the Chairman of the Audit Committee.

10. Criminal Activity

If there is evidence of criminal activity, the Chief Executive Officer/ Chairman of the Audit Committee may inform the police. The Company shall ensure that any internal investigation does not hinder a formal police investigation.

11. Record Keeping

The Investigators shall keep confidential records of all documents relating to allegations or concerns and report back to the Audit Committee on a regular basis.

12. Compliance

The Company shall annually affirm in the Board's Report on Corporate Governance that it has adhered to the provisions of this Policy.

11. Amendment

Subject to the approval of the Board of Directors, this Policy may be amended or modified in whole or in part, from time to time in line with the business requirements of the Company or for to comply with any statutory enactment or amendment thereto.

This Policy has been adopted by the Board of Directors of the Company at its meeting held on **October 31, 2014.**

Last reviewed and amended by the Board of Directors of the Company in its meeting held on **November 06, 2023** and **13th August, 2026.**