

Policy n° 31
Annex. I: India

Whistle Blower Policy and Vigil Mechanism

Ashirvad Pipes Private Limited (“Ashirvad by Aliaxis”)



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APPLICATION

This Annex I (“**Annex I**”) to Policy 31 – Whistleblowing Policy (“**Policy**”) applies only to the businesses in India of Ashirvad by Aliaxis. Ashirvad by Aliaxis will be subject to this Annex I. This Annex I should be read and applied in conjunction with Policy 31 – Whistleblowing Policy and Aliaxis’ Code of Ethics and other applicable Aliaxis policies and procedures.

EXECUTIVE SUMMARY

Section 177 of the Companies Act, 2013 read with Rule 7 of Companies (Meetings of the Board and its Powers) Rules, 2014 (the “**Law**”) requires Indian companies in under certain conditions to have specific whistleblowing rules in place. This Annex I is designed to set forth such rules.

Aliaxis Group has implemented a global Policy 31 – Whistleblowing Policy (“**Policy**”). The Policy applies to all employees, officers, directors, volunteers, or trainees/interns, self-employed persons, whether working full time or part time for an Aliaxis Company, such as at Ashirvad by Aliaxis, the latter collectively “**Ashirvad Personnel**”, as well as executive directors, shareholders and persons belonging to the administrative, management or supervisory bodies of Ashirvad (Ashirvad Personnel and any of the former collectively “**Ashirvad People**” and individually an “**Ashirvad Person**”). The Policy equally applies to persons working with or at Ashirvad’ contractors, subcontractors and suppliers.

Ashirvad by Aliaxis provides Ashirvad People with secure and confidential ways to report in good faith any violation (including suspected **intentional or negligent violation** of laws and regulations, Aliaxis Code of Ethics and/or Aliaxis Group policies (a “**Violation**”). A Severe Violation is a breach which **seriously** affects the interests, especially the **reputation or financially** wise, of Ashirvad or one of its subsidiaries or brands. Other Violations are any Violations which are not defined as a Severe Violation.

A secure online form is accessible to all Ashirvad People via the alert management solution: “**Whispli**”. The online form is available by downloading the Whispli Mobile app and indicating “alixis.whispli.com” as the organization Whispli URL or by scanning the QR code:



Ashirvad by Aliaxis has implemented a Whistleblowing Committee. Typically, an acknowledgement of receipt for the case is given within 7 days and the investigation is conducted within 3 months. In the event an investigation takes longer than 3 months, the Committee handling the specific case shall inform the reporting person accordingly. Where a member of the Committee is conflicted, he or she will not be included in the investigation.

The whistleblowing process shall be carried out in full compliance with applicable laws and regulations, Aliaxis' policies, and in respect with the principles of confidentiality, objectivity, fairness and presumption of innocence.

Ashirvad by Aliaxis values honesty, integrity, and efforts made by Ashirvad People to protect Ashirvad and its reputation. Ashirvad by Aliaxis shall not tolerate any retaliation, directly or indirectly, against anyone who, **in good faith**, reports an ethics or compliance concern or known or potential misconduct, or assists in a review or investigation thereof. Retaliation includes but is not limited to harassment, intimidation, coercion, demotion, transfer, suspension, or termination as a direct result of anyone raising a complaint or allegation. Acts of retaliation (including trying to find out the identity of a reporting person, witness and/or information carrier) can lead to disciplinary action, up to and including termination, in compliance with local laws. Each person reporting a case under the Policy shall be protected from retaliation if they report a misconduct in good faith, i.e. they have reasonable grounds to believe that the information is true at the time of reporting. Such reporting person shall be referred to as a "whistleblower" under the Policy.

Ashirvad by Aliaxis will investigate fairly and impartially and does not tolerate unsubstantiated rumours. Allegations concerning Ashirvad People will only be investigated under the Policy if based upon documented and substantiated facts.

The Policy also affords protection to:

- 'facilitators' (i.e. people assisting the reporting person);
- persons connected to the reporting person and who suffer retaliation in a work-related context (e.g. colleagues or relatives); and
- legal entities that the reporting person owns, works for, or is otherwise connected with in a work-related context.
- Ashirvad People responsible of the investigation or who participates in the investigation for example providing information, as witnesses, etc.

Annexure -1

In addition to what is set out in the Policy summary set forth above, the following shall apply for Ashirvad by Aliaxis, and this for as long as Ashirvad by Aliaxis has borrowed money from the banks and public financial institution in excess of fifty crore rupees :

- In compliance with the Law, the Policy establishes a **vigil mechanism** for the Ashirvad directors and employees to report their genuine concern or grievances.
- The Board of Directors of Ashirvad by Aliaxis nominated Mr. Partha Sarathi Basu, (the “**Appointed Director**”), for the purpose of vigil mechanism to whom other directors and employees may report their concerns. Where such director leaves or ceases to be a director of Ashirvad, the Board of Directors shall nominate a new Appointed Director.
- In addition to the handling of the whistleblower cases in the manner detailed in the Policy, all Ashirvad directors and employees may have the direct access to the Appointed Director in Appropriate or Exceptional cases. “Appropriate or Exceptional cases” means situations where the concerns involve senior management or the board members of Ashirvad by Aliaxis, issues posing immediate and significant financial or reputational risk to Ashirvad by Aliaxis, or circumstances where standard reporting mechanisms are compromised or inappropriate due to conflict of interest or the sensitivity of the information. Reporting the matter in Whispli remains mandatory.
- In line with the Policy, Ashirvad by Aliaxis as well as the Appointed Director is/are **entitled to take action** against any Ashirvad director or Ashirvad Person in case of repeated frivolous complaints. Sanctions include reprimand.
