

ANNEXURE I

India-Specific Vigil Mechanism Provisions

A. APPLICATION and EXECUTIVE SUMMARY

1. This Annexure-I (“Annex I”) forms an integral part of Policy No. 31 dated 28/08/2024 and shall be applicable only to Ashirvad Pipes Private Limited (“Ashirvad”). Ashirvad, shall at all times, be governed by this Annex I read with Policy No. 31, the Aliaxis’ Code of Ethics and other applicable Aliaxis policies and procedures.
2. This Annex I is an addendum to the Policy No. 31 to ensure compliance with Section 177(9) and 177(10) of the Companies Act, 2013, read with Rule 7 of the Companies (Meetings of the Board and its Powers) Rules, 2014 and other applicable Indian laws (the “Applicable Law”).
3. In the event of any inconsistency between this Annex I and Policy No. 31, the provisions of Policy No. 31 shall prevail, except to the extent permitted under the Applicable Law.
4. Section 177 of the Companies Act, 2013, read with the provisions of Rule 7 of Companies (Meetings of the Board and its Powers) Rules, 2014, mandates Indian companies under certain conditions to establish a vigil mechanism enabling directors and employees to report genuine concerns in a manner as may be prescribed.
5. This Annex I sets out the India-specific provisions to ensure compliance with the Applicable Law for Ashirvad.

6. Accordingly:

- i. Policy No. 31 entirely applies to Ashirvad, being an entity owned and/or controlled by Aliaxis.
- ii. In addition to what is set out in Policy No. 31, Annex I shall be applicable to Ashirvad for as long as Ashirvad has borrowed money from the banks / public financial institutions in excess of Rs. Fifty Crores.
- iii. Policy No. 31, read with this Annex I, establishes a vigil mechanism as mandated under the Applicable Law for Ashirvad. The Standard Operating Procedure (SOP) attached herein as **EXHIBIT 1** along with the Guidelines attached herein as **EXHIBIT 2** shall form a part of the vigil mechanism for Ashirvad and shall be followed mandatorily.
- iv. Since the constitution of an Audit Committee under Applicable Law is not applicable to Ashirvad, the Board of Directors of Ashirvad have nominated Mr. Partha Sarathi Basu, as the nominated director for the purpose of vigil mechanism (the "Nominated Director") to whom other directors and employees may report their concerns. In the event the Nominated Director ceases to be a director of Ashirvad due to any reason, the Board of Directors shall nominate a new director as per Applicable Law.
- v. The Nominated Director, may, either himself or through the committee as stated under Clause 5.2 of Policy No. 31, handle the whistleblowing cases without affecting/altering the governance framework, mechanism and structure set out in Policy No. 31. In the event a committee as prescribed under Clause 5.2 of Policy No. 31 is established, such committee shall report to the

Nominated Director. This committee may also include the CFO. The Nominated Director shall have the power to issue additional guidelines and standard operating procedures in order to make the vigil mechanism more efficient.

- vi. In the event the Nominated Director is of a different / contradictory view than the decision recommended by the committee, the same would be informed to the Board in the usual course of business.

- vii. The vigil mechanism established under this Annex I, read with Policy No. 31, is aimed to provide for adequate safeguards against victimization of employees and directors and also to provide direct access to the Nominated Director in exceptional cases.

- viii. No other directors, officers, or employees shall interfere with, obstruct, or improperly influence any whistleblowing report or investigation conducted under Policy No. 31 and/or this Annex I.