

WHISTLE BLOWER / VIGIL MECHANISM POLICY

Oriental Trimex Limited

1. Preamble

Oriental Trimex Limited is committed to conducting its business with integrity, transparency and ethical standards. This Whistle Blower / Vigil Mechanism Policy provides a framework for reporting genuine concerns about unethical behavior, fraud, violation of laws or Company policies.

This Policy is formulated in accordance with **Section 177 of the Companies Act, 2013** and **SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**.

2. Objective

The objectives of this Policy are to:

- Encourage employees and stakeholders to report unethical practices
 - Provide a secure and confidential mechanism for reporting concerns
 - Ensure protection against retaliation
 - Enable timely investigation and corrective action
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3. Applicability

This Policy applies to:

- All employees (permanent, contractual, temporary, trainees)
 - Directors and Key Managerial Personnel
 - Vendors, contractors and other stakeholders associated with the Company
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4. Reportable Matters

Whistle Blowers may report concerns including, but not limited to:

- Fraud or suspected fraud
- Misappropriation of Company assets



- Violation of laws or regulations
 - Breach of Code of Conduct
 - Conflict of interest
 - Financial irregularities
 - Abuse of authority or unethical behavior
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5. Vigil Mechanism

5.1 Reporting Channels

Concerns may be reported through:

- Written communication to the Compliance Officer / Company Secretary
- Email to the designated Whistle Blower email ID
- Direct reporting to the Chairman of the Audit Committee

Anonymous complaints may be considered, subject to sufficient evidence.

6. Confidentiality

- Identity of the Whistle Blower shall be kept confidential
 - Information disclosed shall be shared strictly on a need-to-know basis
 - All records shall be securely maintained
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7. Protection Against Retaliation

- No Whistle Blower shall suffer harassment, retaliation or victimization
 - Any act of retaliation shall be treated as a serious misconduct
 - The Company shall take appropriate disciplinary action against offenders
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8. Investigation Procedure

- All complaints shall be reviewed by the Audit Committee / designated authority
 - A fair, impartial and confidential investigation shall be conducted
 - The Whistle Blower may be contacted for further information, if required
 - Findings and recommendations shall be documented
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9. Action & Corrective Measures

Based on investigation findings, appropriate actions may include:

- Disciplinary action
 - Recovery of losses
 - Process improvements
 - Reporting to regulatory authorities, if required
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10. False or Malicious Complaints

- Deliberately false or malicious complaints may attract disciplinary action
 - Inability to substantiate a complaint shall not be considered malicious
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11. Oversight & Reporting

- The Audit Committee shall oversee the Vigil Mechanism
 - Periodic summary of complaints and actions taken shall be placed before the Board
 - Details shall be disclosed in the Annual Report as required
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12. Access to Audit Committee

Whistle Blowers shall have direct access to the Chairman of the Audit Committee in exceptional cases.

13. Compliance with Laws

This Policy shall be implemented in accordance with:

- Companies Act, 2013
- SEBI (LODR) Regulations
- Other applicable laws and guidelines

In case of any conflict, statutory provisions shall prevail.

14. Policy Review & Amendment



- This Policy shall be reviewed periodically by the Board / Audit Committee
 - Amendments shall be made as per changes in law or governance practices
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For Oriental Trimex Limited

