

Shree Maruti Integrated Logistics Limited

Vigil Mechanism Policy

1. Introduction

This Vigil Mechanism Policy (“Policy”) is established in compliance with Section 177 of the Companies Act, 2013 and the rules made thereunder. The objective of this Policy is to provide a secure and confidential mechanism for employees, directors, and other stakeholders to report concerns about unethical behavior, actual or suspected fraud, or violation of the Company’s code of conduct.

2. Objective

The Policy aims to:

- Promote a culture of transparency, accountability, and ethical conduct.
- Encourage employees to report any genuine concerns without fear of retaliation.
- Provide adequate safeguards against victimization.
- Ensure appropriate actions are taken for reported concerns.

3. Applicability

This Policy applies to:

- All directors, employees (permanent, contractual, or temporary), and stakeholders of the Company.

4. Scope of the Policy

The Vigil Mechanism may be used for reporting concerns relating to:

- Unethical behavior or malpractices.
- Financial irregularities, fraud, or misappropriation of funds.
- Violation of the Company’s policies, including the Code of Conduct.
- Breach of any applicable laws or regulations.
- Abuse of authority or discriminatory practices.

5. Reporting Procedure

1. Raising a Concern

- A written report can be submitted to the designated **Whistleblower Officer**.
- Reports can also be sent via email or physical letters marked “Confidential.”

2. Details to be Included

- Name, contact details, and relationship with the Company.
- Detailed description of the concern along with supporting evidence.

3. Confidentiality

- The identity of the whistleblower shall be kept confidential.
- Anonymous complaints will be considered if accompanied by sufficient evidence.

6. Investigation Process

- **Initial Review:** Upon receiving a complaint, the Whistleblower Officer will acknowledge receipt and conduct a preliminary assessment.
- **Investigation:** If necessary, an investigation will be initiated either internally or through external experts.

Corporate Office : 52A - TITANIUM, Near Prahladnagar Garden, Corporate Road,
Ahmedabad (Gujarat) - 380015. | **PH:** 079-40394918

- **Report and Action:** The findings of the investigation shall be reported to the Audit Committee. Appropriate disciplinary or corrective actions will be taken.

7. Protection Against Retaliation

- The Company ensures protection to whistleblowers from any form of retaliation, including termination, suspension, demotion, harassment, or discrimination.
- Anyone found guilty of victimizing the whistleblower shall face strict disciplinary action.

8. Role of the Audit Committee

- The Audit Committee shall oversee the implementation of the Vigil Mechanism.
- It shall ensure impartiality and fair investigation of complaints.
- The Committee shall review reports on a regular basis.

9. False Complaints

- While genuine complaints are encouraged, false or malicious complaints will lead to disciplinary action.
- The Company reserves the right to take legal action against complainants found guilty of intentionally making false allegations.

10. Disclosure

The details of the Vigil Mechanism shall be disclosed on the Company's website and in the Board's Report as required under applicable laws.

11. Amendments

The Board of Directors reserves the right to amend, modify, or replace this Policy at any time, subject to applicable laws.

For and on behalf of
Shree Maruti Integrated Logistics Limited

Sd/-
Maulik Rambhai Mokariya
Chairman & Director
DIN: 05310868

*The policy is adopted by Board in its meeting dtd. 21.06.2023.