

ELECTRODRIVE POWERTRAIN SOLUTIONS PRIVATE LIMITED

CIN : U74999TZ2017PTC029256

**ELECTRODRIVE POWERTRAIN SOLUTIONS PVT LTD (Electra EV)**

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Registered Office: SF No. 698/3, Irugur, Michael Job College, Ravathur, Sulur, Coimbatore, Palladam, Tamil Nadu, India - 641402.

Corporate Office: Survey No. 255/1/8, Opposite New PVR Mall, Hinjewadi Phase-2, Pune - 411057.

E-mail: secretarial@electraev.com | **Website:** www.electraev.com | **Telephone No.:** 020 - 6799 2300

Version 1.0

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VIGIL MECHANISM/WHISTLEBLOWER POLICY

This Policy is approved by the Board of Directors of **ELECTRODRIVE POWERTRAIN SOLUTIONS PRIVATE LIMITED** (the “Company”) at its meeting held on August 14, 2023 and is effective from the date of approval.

Complaints and the Investigation Procedure:

The following procedure (vigil mechanism) have been adopted by the Board of Directors of the Company to govern the receipt and treatment of complaints and to protect the confidentiality and anonymous reporting of the same.

This Policy and its procedures apply to and are available to all directors, employees of the Company, its subsidiary and all external stakeholders.

I. POLICY:

Directors and Employees can submit / report ‘Complaints’ pertaining to the following areas such as:

a) Fraudulent Activities:

Any act of deliberate misrepresentation that could harm the interests of investors, regulatory authorities, or the investing public, including but not limited to mail or wire fraud, bank fraud, or fraudulent disclosures.

b) Regulatory Violations:

Breaches of any laws, rules, or regulations applicable to the Company, particularly those related to accounting practices, internal controls, and auditing procedures.

c) Financial Misconduct:

Intentional errors or fraudulent acts in the preparation, review, or audit of the Company’s financial statements.

d) Ethical Violations:

Any conduct that contravenes the Company’s ethical standards as outlined in its Code of Business Conduct and Ethics.

e) Other Misconduct:

Any other action or event that could adversely affect the interests or reputation of the Company and its stakeholders.

The Company is committed to protecting the confidentiality and, where possible, the anonymity of complainants, with the primary objective of ensuring a fair and thorough review process.

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External stakeholders such as vendors, customers, and business partners—are welcome to submit complaints. However, the Company is not obligated to maintain confidentiality or anonymity for complaints received from non-employees. To facilitate a more effective review, we encourage individuals to identify themselves rather than submit complaints anonymously. While anonymous submissions are accepted, providing contact details significantly improves our ability to investigate and resolve concerns.

The Company will implement appropriate safeguards to protect employees from retaliation or victimization for raising concerns in good faith. Employees who believe they have been adversely affected by actions taken under this policy will have the opportunity to present their case before the Board of Directors.

If a complaint is found to have been made with malicious intent or if there are repeated instances of frivolous complaints, the Company reserves the right to take appropriate disciplinary action, including formal reprimand.

We strongly encourage directors, employees of the Company, its subsidiary and all external stakeholders to report genuine concerns and complaints in good faith, in the interest of maintaining an ethical and transparent workplace.

II. PROCEDURES:

Receipt of complaints under this policy should be reported to the CEO and Executive Director.

The various ways in which a complaint can be made are as under:

1. Contact Number: Mr. Samir Yajnik
2. Email: speakup@electraev.com
3. Mailing address CEO and Executive Director: Survey 255/1/8, Hinjawadi Phase 2 Rd, Opposite Grand Highstreet Mall, Hinjawadi, Pune – 411057 Maharashtra, India

Upon receipt, the CEO and Executive Director will review the complaint and determine the appropriate course of action:

1. Review and investigation of complaints:

Investigation can be made directly by the CEO and Executive Director, or can be assigned to another employee, any committee, external counsel, advisor, expert, or third-party service provider. The CEO and Executive Director may direct that any individual involved in the investigation, report to or collaborate with the CEO and Executive Director or an appointed legal representative.

2. Cooperation and right to respond:

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The individual(s) against whom the complaint has been made are expected to fully cooperate with the investigation and will be given an opportunity to be heard during the process.

3. Reporting to the Board:

The CEO and Executive Director shall submit a summary report, if required, to the Board of Directors. This report will include:

- a) The identity of the complainant (if not anonymous).
- b) A brief description of the nature of the complaint.
- c) The current status of the investigation.
- d) Any conclusions drawn by the investigator.
- e) Key findings and recommendations.

4. Access to reports and records & disclosure of investigation results:

All reports, records, and documentation related to complaints are considered strictly confidential. Access to this information is limited to:

- Board of Directors.
- Any other individual authorized by the CEO and Executive Director.

Complaints, along with any related investigations, findings, and actions taken, will not be disclosed publicly except where required by applicable laws, regulations, or internal Company policies in effect at the time.

5. Retention of records:

All documents pertaining to complaints submitted under this Policy shall be retained for a minimum of **five (5) years** from the date of the complaint. These records may be destroyed thereafter, unless:

- They are relevant to ongoing or anticipated litigation, inquiries, or investigations.
- Retention is otherwise required by applicable legal or regulatory obligations.

In such cases, documents will be retained until the matter is fully resolved and no longer requires preservation.

6. Amendment to the Policy

The Company reserves the right to amend, revise, or update this Policy, in whole or in part, at its sole discretion and without prior notice. Any changes will be communicated appropriately and made available on the Company's official website.

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