1.0	Preface :
	The Company has adopted the Code of Ethics & Business Conduct, which lays down the principles and standards that should govern the actions of the Company and its employees. Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company. The role of employees in pointing out such violations of the Code cannot be undermined. Accordingly, this Whistle-blower Policy ("the Policy") has been formulated with a view to provide a mechanism for employees of the Company to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.
2.0	Objective :
	The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. This policy aims to provide an avenue for employees to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.
3.0	Policy :
	The Whistle-blower policy intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company. The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation. The Company encourages not only internal employees but also external stakeholders, including suppliers, contractors and other business partners, to report any unethical, illegal or environmentally or socially irresponsible conduct associated with the Company's activities. This ensures alignment with the Company's Sustainability and Responsible Procurement commitments under its ESG framework.
4.0	Definitions :
	a) "Disciplinary Action" means any action that can be taken on the completion of / during the investigation proceedings including but not limited to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
	b) "Employee" means every employee of the Company.
	c) "Protected Disclosure" means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosures should be factual and not speculative in nature.
	d) "Subject" means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation under this Policy.
	e) "Whistle-blower" is someone who makes a Protected Disclosure under this Policy.
	f) "Whistle Officer" means an officer who is nominated / appointed to conduct detailed investigation of the disclosure received from the whistle-blower and recommends disciplinary action.
	g) "Company" means, "Tamboli Castings Limited".
	h) "Good Faith": An employee shall be deemed to be communicating in " good faith" If there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge or a factual basis for the communication or where the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.
	i) "Policy" means, "Whistle-blower Policy."
	j) "External Stakeholder" means any supplier, vendor, contractor, consultant, customer, or third party associated with TCL's operations, who may report concerns under this Policy.
	k) "ESG Violation" means any action that contravenes the Company's commitments under its Environment, Social, and Governance (ESG) framework, including human rights, corruption, environmental negligence or occupational safety violations.

5.0	Scope :
	Various stakeholders of the Company are eligible to make Protected Disclosures under the Policy. These stakeholders may fall into any of the following broad categories : a) Employees of the Company, b) Employees of other agencies deployed for the Company's activities, whether working from any of the Company's offices or any other location, c) Contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company, d) Customers of the Company, e) Any other person having an association with the Company, A person belonging to any of the above mentioned categories can avail of the channel provided by this Policy for raising an issue covered under this Policy. This Policy also acts as a grievance mechanism for external stakeholders to report adverse sustainability or ethical impacts connected with TCL's business activities.
	The Policy covers malpractices and events which have taken place/ suspected to take place involving: a) Abuse of authority, b) Breach of contract, c) Negligence causing substantial and specific danger to public health and safety, d) Manipulation of company data / records, e) Financial irregularities, including fraud or suspected fraud or Deficiencies in Internal Control and check or deliberate error in preparations of Financial Statements or Misrepresentation of financial reports, f) Any unlawful act whether Criminal / Civil, g) Pilferation of confidential / propriety information, h) Deliberate violation of law / regulation, i) Wastage / misappropriation of company funds / assets, j) Breach of Company Policy or failure to implement or comply with any approved Company Policy. Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.
6.0	Guiding principles :
	To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will : a) Ensure that the Whistle-blower and / or the person processing the Protected Disclosure is not victimized for doing so, b) Treat victimization as a serious matter, including initiating disciplinary action on person/(s) indulging in victimisation,

	c) Ensure complete confidentiality, d) Not attempt to conceal evidence of the Protected Disclosure, e) Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made / to be made, f) Provide an opportunity of being heard to the persons involved especially to the subject. g) Ensure multiple safe and accessible reporting channels — including confidential Email ID (psy@tambolicastingslimited.com), sealed complaint box (Custody : Personal Secretary - psy), for employees and external stakeholders to report concerns without fear. h) Conduct awareness and training programs at least once a year to ensure that all employees and contract staff understand the reporting mechanism and their rights under this Policy.
7.0	Anonymous allegation :
	Whistleblowers must put their names to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified. Disclosures expressed anonymously will ordinarily NOT be investigated.
8.0	Protection to whistle-blower :
	a. If one raises a concern under this Policy, he / she will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes discrimination, reprisal, harassment or vengeance in any manner. Company's employee will not be at the risk of losing her / his job or suffer loss in any other manner like transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle-blower's right to continue to perform his / her duties / functions including making further Protected Disclosure, as a result of reporting under this Policy. The protection is available provided that : 1. The communication / disclosure is made in good faith, 2. He / She reasonably believes that information, and any allegations contained in it, are substantially true; and 3. He or She is not acting for personal gain. Anyone who abuses the procedure (for example by maliciously raising a concern knowing it to be untrue) will be subject to disciplinary action, as will anyone who victimizes a colleague by raising a concern through this procedure. If considered appropriate or necessary, suitable legal actions may also be taken against such individuals. However, no action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.
	b. The Company will not tolerate the harassment or victimization of anyone raising a genuine concern. As a matter of general deterrence, the Company shall publicly inform employees of the penalty imposed and disciplinary action taken against any person for misconduct arising from retaliation. Any investigation into allegations of potential misconduct will not influence or be influenced by any disciplinary or redundancy procedures already taking place concerning an employee reporting a matter under this policy. Any other Employee / business associate assisting in the said investigation shall also be protected to the same extent as the Whistle-blower.
	c. Protection under this Policy shall also extend to external whistleblowers such as suppliers, contractors, or customers who raise genuine concerns related to corruption, human rights, environmental negligence, or unethical conduct associated with TCL's operations.

	d. In alignment with the Company's Zero Retaliation, any instance of retaliation or intimidation against a whistle blower or witness will result in immediate disciplinary action.
	e. The Company shall ensure that whistleblower awareness sessions are conducted annually and the mechanism is displayed prominently on the notice boards and intranet.
	f. Anonymous disclosures shall also be accepted if they contain sufficient detail to enable investigation.
9.0	Accountabilities – Whistle-blowers :
	a) Bring to early attention of the Company any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern. Delay in reporting may lead to loss of evidence and also financial loss for the Company. b) Avoid anonymity when raising a concern, c) Follow the procedures prescribed in this policy for making a Disclosure, d) Co-operate with investigating authorities, maintaining full confidentiality, e) The intent of the policy is to bring genuine and serious issues to the fore and it is not intended for petty Disclosures. Malicious allegations by employees may attract disciplinary action, f) A whistle-blower has the right to protection from retaliation. But this does not extend to immunity for involvement in the matters that are the subject of the allegations and investigation, g) Maintain confidentiality of the subject matter of the Disclosure and the identity of the persons involved in the alleged Malpractice. It may forewarn the Subject and important evidence is likely to be destroyed, h) In exceptional cases, where the whistle-blower is not satisfied with the outcome of the investigation carried out by the Whistle Officer, he / she can make a direct appeal to the Chairman of the Company.
10.0	Accountabilities – Whistle Officer :
	a) Conduct the enquiry in a fair, unbiased manner, b) Ensure complete fact-finding, c) Maintain strict confidentiality, d) Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom, e) Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures, f) Record deliberations and document the final report.
11.0	Rights of a subject :
	a) Subjects have the right to be heard and the Whistle Officer must give adequate time and opportunity for the subject to communicate his / her say on the matter, b) Subjects have the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry / investigation process.
12.0	Management action on false disclosures. :
	An employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures. Further this policy

	may not be used as a defence by an employee against whom an adverse action has been taken independent of any disclosure made by him and for legitimate reasons or cause under Company rules and policies.
13.0	Procedure for reporting & dealing with disclosures :
	Procedure for reporting & dealing with disclosures is mentioned in Annexure - A.
14.0	Access to reports and documents :
	All reports and records associated with " Disclosures" are considered confidential information and access will be restricted to the Whistle-blower, and Whistle Officer. "Disclosures" and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at that time.
15.0	Retention of documents :
	All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of 5 years.
15.1	All whistleblower records and investigation outcomes shall also be reviewed by the Ethics and Sustainability Committee (Committee members : Chairman, Sr. Vice-President, Vice-President, SIC-PS, SIC-AM and Personal Secretary) on an annual basis to identify systemic risks and improvement opportunities.
15 A.	Continuous Improvement and Disclosure.
15 A.1	The Company shall periodically review (Once in a year, in month of April) this Policy and related procedures to ensure they remain effective, accessible and aligned with legal and sustainability requirements.
15 A.2	The overall effectiveness of the Whistleblower mechanism, including the number and type of complaints, resolution rate, and awareness activities conducted, shall be reported as part of the Company's Sustainability or ESG disclosures.
16.0	Reports :
	A quarterly status report on the total number of complaints received during the period, with summary of the findings of the Whistle officer and the corrective actions taken will be sent to the Chairman of the Company.

Annexure A

Sub : Procedure for Reporting & Dealing With Disclosures

1. How should a Disclosure be made and to whom ?
   A Disclosure should be made in writing. Letters can be submitted by hand-delivery, courier or by post addressed to the Whistle Officer appointed by the Company. Whilst, a disclosure should normally be submitted to the Whistle Officer, it may also be submitted directly to the Chairman of the Company's Board of Directors when the Whistle-blower feels it necessary under the circumstances.

2. Format for submitting the Disclosure
   While there is no specific format for submitting a Disclosure, the following details are to be given :

   (a) Name, address and contact details of the Whistle-blower.

   (b) Brief description of the Malpractice, giving the names of those alleged to have committed or about to commit a Malpractice. Specific details such as time and place of occurrence are also important.

   (c) The disclosure should be sealed in an envelope marked "Whistle-blower" and addressed to the Whistle Officer OR Chairman, depending on position of the person against whom disclosure is made.

   (d) Disclosures can also be made via the Company's dedicated Whistleblower Email ID, which ensures confidentiality and data protection.

3. What will happen after the Disclosure is submitted?

   (a) The Whistle Officer shall acknowledge receipt of the Disclosure as soon as practical (preferably within 07 days of receipt of a Disclosure), where the Whistle-blower has provided his / her contact details.

   (b) The Whistle Officer will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the Disclosure constitute a Malpractice by discussing with the Chairman of the Company (if required). If the Whistle Officer determines that the allegations do not constitute a Malpractice, he / she will record this finding with reasons and communicate the same to the Whistle-blower.

   (c) If the Whistle Officer determines that the allegations constitute a Malpractice, he / she will proceed to investigate the Disclosure with the assistance from persons, as he / she deems necessary. If the alleged Malpractice is required by law to be dealt with under any other mechanism, the Whistle Officer shall refer the Disclosure to the appropriate authority under such mandated mechanism and seek a report on the findings from such authority.

   (d) Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.

   (e) The investigation may involve study of documents and interviews with various individuals. Any person required to provide documents, access to systems and other information by the Whistle Officer for the purpose of such investigation shall do so. Individuals with whom the Whistle Officer requests an interview for the purposes of such investigation shall make themselves available for such interview at reasonable times and shall provide the necessary cooperation for such purpose.

   (f) If the Malpractice constitutes a criminal offence, the Whistle Officer will bring it to the notice of the Chairman and take appropriate action including reporting the matter to the police.

(g) The Chairman of the Company may, at his / her discretion, participate in the investigations of any Disclosure.

(h) The Whistle officer shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chairman as soon as practically possible and in any case, not later than 90 days from the date of receipt of the Disclosure. The Whistle Officer may be allowed additional time for submission of the report based on the circumstances of the case.

(i) Whilst it may be difficult for the Whistle Officer to keep the Whistle-blower regularly updated on the progress of the investigations, he / she will keep the Whistle-blower informed of the result of the investigations and its recommendations subject to any obligations of confidentiality.

(j) The Whistle Officer will ensure action after investigation and keep the Whistle-blower informed of the same. Though no timeframe is being specified for such action, the Company will endeavour to act as quickly as possible in cases of proved Malpractice.

4. What should the whistle-blower do if he / she faces any retaliatory action or threats of retaliatory action as a result of making a Disclosure?

If the whistle-blower faces any retaliatory action or threats of retaliatory action as a result of making a Disclosure, he / she has to inform the Whistle Officer in writing immediately, who will take cognizance of each and every such complaint / feedback received and investigate the same accordingly and may also recommend appropriate steps to protect him / her from exposure to such retaliatory action and ensure implementation of such steps for his / her protection.

Summary of time line

(All period mentioned hereunder are with ref. to the receipt of Disclosures by Chairman)

Sr. no.	Activity	No of calendar days, not exceeding	Remark
1	Disclosure by Whistle blower	0	
2	Receipt of Disclosure by the Chairman	0 + 7 = 7	
3	Appointment of Whistle Officer.	7 + 3 = 10	
4	Submission of written Investigation Report by Whistle Officer to the Chairman.	10 + 80 = 90	
5	Informing outcome of investigation to the whistle blower by whistle officer.	As soon as practically possible after 90 days.	

(Chairman)
Authorised signatory

Date : 01.04.2025

Copy to : 1. VBT, 2. SVP, 3. VP, 4. to 23. SIC-PT+PJ, MK, EG, MT+ST, PT, PJ, WX, SH, ML, FT, M1, M2, TR, PP, PS, IT, LG, QC, AC and AM.