

## 1. PREAMBLE

TARON Material Handling Equipments Private Ltd (hereafter referred to as “Company” in this document) believes in promoting a fair, transparent, ethical and professional work environment. While the company code of conduct defines the expectations from employees in terms of their integrity and professional conduct, the vigil mechanism defines the mechanism for reporting deviations from the standards defined in the code. The Vigil mechanism is implemented not only as a safeguard to unethical practices. This mechanism is intended to provide mechanism for reporting genuine concerns or grievance and ensure that deviations from the company’s Code of Conduct and Values are dealt with in a fair and unbiased manner as provided in Section 177 (9) and (10) of the Companies Act, 2013 and the Companies Rules, 2014.

## 2. OBJECTIVE

The objectives of this Policy are to:

- Enable directors, employees and stakeholders to raise concerns regarding unethical or improper practices.
- Provide adequate safeguards against victimization of persons using the mechanism.
- Ensure an impartial and fair investigation of reported concerns.
- Ensure transparency, integrity and accountability in the Company’s operations.

## 3. SCOPE OF THE POLICY

This Policy applies to:

- All employees (permanent, contractual, trainees, consultants);
- Directors of the Company;
- Third parties such as vendors, customers, service providers, and other stakeholders, to the extent permitted.

The mechanism covers concerns related to:

- Fraud, misappropriation or financial irregularities;
- Bribery, corruption or violation of anti-corruption laws;
- Misuse of Company property or confidential information;
- Violation of the Code of Conduct, HR policies or legal obligations;
- Instances of discrimination, harassment or abuse of authority;
- Any other unethical, dishonest or improper conduct.

This Policy **does not** cover HR grievances such as salary disputes, performance appraisals, or interpersonal issues unless they involve unethical practice or violations stated above.

#### 4. DEFINITIONS

- a. **Whistle Blower** – A person who reports a Genuine Concern in good faith.
- b. **Genuine Concern** – A concern raised based on reasonable belief that an unethical practice or misconduct has occurred, is occurring, or is likely to occur.
- c. **Vigilance Officer / Ethics Officer** – Person appointed to administer the Policy.

#### 5. VIGILANCE OFFICER / ETHICS OFFICER

The Board appoints **Sunu Mathew** as the **Vigilance Officer**, responsible for:

- Receiving complaints;
- Maintaining confidentiality;
- Conducting preliminary scrutiny;
- Coordinating investigation and reporting to the Audit Committee.

Contact details:

- Email: [compliance@leapindia.net](mailto:compliance@leapindia.net)
- Address: **VIGILANCE OFFICER**

14<sup>th</sup> Floor, Commerz, International Business Park, Oberoi Garden City, Off Western Express Highway, Goregaon (East), Mumbai, Maharashtra- 400063

#### 6. REPORTING OF CONCERNS

A Whistle Blower may raise a concern in any of the following ways:

- a. **Email:** [compliance@leapindia.net](mailto:compliance@leapindia.net)

Send a written complaint with relevant facts to: **[vigil / ethics email]**

- b. **Physical letter:**

Marked as “*Private & Confidential – Whistle Blower Matter*” to:

**The Vigilance Officer**

14<sup>th</sup> Floor, Commerz, International Business Park,  
Oberoi Garden City, Off Western Express Highway,  
Goregaon (East), Mumbai, Maharashtra- 400063

**Details to be provided:**

- Description of concern;
- Individuals involved;
- Evidence, documents, or witnesses (if available);
- Time and location of incident.

Anonymous complaints may be investigated if the information is credible and sufficient.

## **7. INVESTIGATION PROCESS**

1. All complaints will be acknowledged within **7 working days**.
2. Preliminary assessment will be completed within **15 days** by the Vigilance Officer.
3. If found maintainable, the matter will be placed before the **Board** for investigation.
4. The Board may appoint internal/external investigators, auditors or subject matter experts.
5. Investigations will be conducted in an unbiased, confidential and lawful manner and completed typically within **45–60 days**.
6. A final report will be submitted to the Board with recommended actions.

## **8. PROTECTION AGAINST VICTIMIZATION**

- No Whistle Blower shall be victimized, discriminated, harassed or retaliated against for reporting a concern in good faith.
- Retaliation will result in strict disciplinary action.
- A Whistle Blower who believes he/she is being victimized may report the same directly to the Board.

## **9. CONFIDENTIALITY**

All information received shall be kept strictly confidential to protect:

- Identity of the Whistle Blower (unless disclosure is mandated by law);
- Integrity of the investigation process;
- Evidence and witnesses.

## **10. FALSE ALLEGATIONS**

- Whistle Blowers must report with good faith and reasonable belief.
- Malicious, frivolous or knowingly false complaints may result in disciplinary action.

## **11. DECISION AND REPORTING**

- The Board shall take appropriate action based on the investigation report.
- Findings may be shared with statutory authorities where required.
- A summary of complaints and actions taken shall be reviewed periodically by the Board.

## **12. DOCUMENT RETENTION**

- All documents related to complaints, investigations and outcomes shall be preserved for **8 years** or such period as required by law.

### **13. COMMUNICATION & DISPLAY**

This Policy shall be:

- Posted on the Company's website;
- Notified in the annual Board's report as required under Section 177(10).

### **14. AMENDMENT**

- The Company reserves the right to amend or modify this Policy in whole or in part, at any time, with the approval of the Board to comply with legal and regulatory updates.