

AUTOLITE (INDIA) LIMITED
CIN: L31506RJ1977PLC001738
Registered office: D 469. Road no 9A,
V.K.I. Area, Jaipur, Rajasthan
Email id: info@autopal.com
Website: [www. autopal.com](http://www.autopal.com)

VIGIL MECHANISM AND WHISTLE BLOWER POLICY

1. INTRODUCTION

The Code of Business Principles (CoBP) is the Company's statement of values and represents the standard of conduct which all employees are expected to observe in their business endeavors. The Code reflects the Company's commitment to principles of integrity, transparency and fairness. It forms the benchmark against which the world at large is invited to judge the Company's activities. The Company has adopted a Whistle Blower Policy, as part of vigil mechanism to provide appropriate avenues to the Directors and employees to bring to the attention of the management any issue which is perceived to be in violation of or in conflict with the fundamental business principles of the Company.

Alternatively, employees can also send written communications to the Company. The employees are encouraged to voice their concerns by way of whistle blowing and all the employees have been given access to the Audit Committee. The Company Secretary is the designated officer for effective implementation of the policy and dealing with the complaints registered under the policy. All cases registered under the Code of Business Principles and the Whistle Blower Policy of the Company, are reported to the Committee of Executive Directors and are subject to the review of the Audit Committee.

2. REPORTING MECHANISM

Employees have a right to make Protected Disclosures directly to the Chairman of the Audit Committee as follows:

- a) By email to info@autopal.com
- b) By letter addressed to Audit Committee, marked "Private and Confidential", and delivered to the Chairman of the Audit Committee, Autolite (INDIA) Limited, D 469 Road no 9A, V.K.I. Area, Jaipur 302013.

3. PROTECTION TO WHISTLE BLOWERS

- a) If a Whistle-blower does provide his or her name when making a Protected Disclosure, Company will treat as confidential the identity of the Whistle-Blower and the fact that a Protected Disclosure has been made, except as otherwise required by law and to the extent possible while allowing an investigation to proceed.
- b) A Whistle-blower may make a Protected Disclosure without fear of retaliation or intimidation. Company prohibits its Employees from engaging in retaliation or intimidation that is directed against a Whistle-blower. Employees who

engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, which may include dismissal.

- c) However, if a Whistle-blower has been found to have made a deliberately false Protected Disclosure, that Whistle-blower may be subject to disciplinary action, which may include dismissal.

4. ROLE OF AUDIT COMMITTEE

The Audit Committee is responsible for supervising the development and implementation of this Policy. The Audit Committee shall periodically review the Policy to consider whether amendments are necessary, and, if so, it shall communicate any such amendments to all Employees as soon as possible.

5. CONFLICTS OF INTEREST

Where a Protected Disclosure concerns any members of the Audit Committee, that member of the Audit Committee shall be prevented from acting in relation to that Protected Disclosure. In case of doubt, the Chairman of the Board of Directors shall be responsible for determining whether a member of the Audit Committee must recuse himself or herself from acting in relation to a Protected Disclosure.
