

**WHISTLEBLOWER POLICY**  
**ZENITH STEEL PIPES & INDUSTRIES LIMITED**

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## 1. PURPOSE

Zenith Steel Pipes & Industries Limited (“ZSPIL”) and its subsidiaries (collectively the “ZSPIL Group”) are committed to complying with the foreign and domestic laws that apply to them, satisfying the Company’s Code of Conduct and Ethics, and particularly to assure that business is conducted with integrity and that the Company’s financial information is accurate. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties that can be costly.

Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Directors, employees or any other person including vendors, contractors, subcontractors, consultants, trainees, shareholders, former employees, job applicants and any other third parties (collectively referred hereinafter as “Person(s)”) must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. You are required to read this Policy and submit the attached certification that you will comply with it.

The purpose of the Whistle-blower Policy (“Policy”) is as follows:

- To encourage the employees and other parties to report unethical behaviours, malpractices, wrongful conduct, fraud, violation of the Company’s policies & values, violation of law by any employee of the Company without any fear of retaliation.
- To build and strengthen a culture of transparency and trust within the organization.
- To enable employees to report instances of disclosure of unpublished price sensitive information suspected disclosure of unpublished price sensitive information to the Company

## 2. YOUR DUTY TO REPORT

Everyone is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company’s Code of Conduct and Ethics. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations, insider trading, leak of unpublished price sensitive information, bribery, or violations of the anti-retaliation aspects of this Policy. Consult the Company’s Code of Conduct and Ethics for a more detailed description of potential violations and other areas of particular concern. Retaliation includes adverse actions, harassment, or discrimination relating to your reporting of a suspected violation.

It is the Policy of the Company that you must, when you reasonably suspect that a violation of an applicable law or the Company's Code of Conduct and Ethics has occurred or is occurring, report that potential violation. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws. You should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.

### **3. HOW TO REPORT**

You can write to **cs@birlaprecision.com**, or to the Chief Compliance Officer at **harishpareek@birlaprecision.com**. If you have concerns about reaching out to the Chief Compliance Officer, your report may be made to the Chairman of the Audit Committee, Mr. Srinivasa Raghavan Dorai Rajan through "**durai@kiapindia.com**". Because you have several means of reporting, you need never report to someone you believe may be involved in the suspected violation or from whom you would fear retaliation.

Your report should include as much information about the suspected violation as you can provide. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. Where you have not reported anonymously, you may be contacted for further information.

### **4. INVESTIGATIONS AFTER YOU REPORT**

All reports under this Policy will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. Everyone working for or with the Company has a duty to cooperate in the investigation of reports of violations. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action, including termination of employment. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

### **5. RETALIATION IS NOT TOLERATED**

There shall not be any adverse action against any Person for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation of any law, this Policy, or the Company's Code of Conduct and Ethics. The Company takes reports of such retaliation seriously. Incidents of retaliation against any Person reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting Persons may also be subject to civil, criminal and administrative penalties.

#### **6. DOCUMENT RETENTION**

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

#### **7. MODIFICATION**

The Audit Committee or the Board of Directors of the Company can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with federal, state or local regulations and / or accommodate organizational changes within the Company. Please sign the acknowledgment form below and return it to Human Resources. This will let the Company know that you have received the Whistle Blower Policy and are aware of the Company's commitment to a work environment free of retaliation for reporting violations of any Company policies or any applicable laws.