

**J S AUTO CAST FOUNDRY INDIA PRIVATE LIMITED**  
**SF NO 165/1 SEMBAGOUNDEN PUDUR, KUPPEPALAYAM,**  
**COIMBATORE-641107**  
**CIN: U27310TZ2004PTC011284**

**VIGIL MECHANISM POLICY**

**Introduction:**

Section 177 of the Companies Act, 2013 mandates the following classes of Companies to constitute a Vigil Mechanism for the directors and employees to report genuine concerns or grievances about unethical behaviors, actual or suspected fraud or violation of Company Code of conduct or ethics policy.

- Every listed Company;
- Every other Company which accepts deposits from the public;
- Every Company which has borrowed money from banks and public financial institutions in excess of Rs. 50 crores.

The Company shall formulated a policy to provide an opportunity to its employees and directors to report their genuine concerns or grievances directly to the Vigilance officer Mr. C.MADHAN MOHAN

In compliance with the aforesaid Act, the Company has framed the Vigil mechanism policy.

**Scope:**

It covers all the Permanent employees and Director of the Company.

**Definition:**

- The Company means “J S AUTO CAST FOUNDRY INDIA PRIVATE LIMITED.”
- Employees mean all permanent employees of the Company.
- Directors means define as per Section 2(36) of the Companies Act, 2013.
- Policy or This Policy means, “Vigil Mechanism Policy.”

**Interpretation:**

Terms that have not been defined in this Policy, shall have the same meaning assigned to them in the Companies Act, 2013 read along with the rules as amended from time to time.

**Guidelines:**

**Protection under Policy**

The vigil mechanism shall provide for adequate safeguards against victimization of employees and directors who avail of the vigil mechanism and report their genuine concerns or grievances.

**Disclosure & Maintenance of Confidentiality**

Employees and directors shall report to through e-mail addressed to [madhanmohan.c@jsautocast.com](mailto:madhanmohan.c@jsautocast.com). Confidentiality shall be maintained to the greatest extent possible.

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**Frivolous complaints**

In case of repeated frivolous complaints being filed by a director or an employee, the vigilance officer may take suitable action against the concerned director or employee including reprimand.

**Procedure:**

- Any employee or director shall submit a report of the genuine concerns or grievances to the vigilance officer.
- the vigil mechanism shall provide direct access to the vigilance officer.
- Vigilance officer shall appropriately investigate all grievances received. In this regard, vigilance officer to investigate into the matter and prescribe the scope and time limit therefore.
- Vigilance officer shall have right to outline detailed procedure for an investigation.
- Vigilance officer shall have right to call for any information/document and examination of any employee or director of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.
- A report shall be prepared after completion of investigation and the Officer shall consider the same.
- The decision or direction of the Vigilance officer shall be final and binding.

**Savings:**

This policy can be changed, modified or abrogated at any time by the Board of Directors of the Company.

**Notification:**

The Vigilance Officer shall be responsible for intimating to all Directors and Departmental heads of any changes in policy.

This policy as amended from time to time shall be disclosed by the company on its website.