

Vigil Mechanism Policy

INTRODUCTION

Mahan Industries Limited (hereinafter referred to as “the Company”) recognizes the value of transparency and accountability in its administrative and management practices. As a public limited and listed company, the integrity in the financial matters of the Company and the accuracy of its financial information is paramount. The Company’s financial information guides the decision of the Board of Directors of the Company (Board). The Shareholders of the Company and the financial markets rely on its information to make decisions. For these reasons, the Company must maintain a workplace where it can retain and treat all complaints concerning serious misconduct, i.e. conduct which results in violation of law by the Company or in a substantial mismanagement of Company resources, unethical behaviour, actual or suspected fraud or violation of the Company’s code of conduct or ethics policy, questionable accounting practices, internal accounting controls, or auditing matters. The employees should be able to raise these concerns free of any discrimination, retaliation or harassment. Therefore, it is the policy of the Company to encourage employees, when they reasonably believe that such serious misconduct have occurred or are occurring, to report those concerns to the Company’s management as described below.

All reports will be taken seriously and will be promptly investigated. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported, and the quality of the information provided. Where serious misconduct has occurred, those matters will be corrected and, if appropriate, the persons responsible will be disciplined.

APPLICABILITY:

This Vigil Mechanism (Whistle Blower Policy) is applicable to all employees of the Company irrespective of any grade/category/ designation.

REPORTING

If you have a reason to believe that you have become aware of such serious misconduct, you must immediately report those facts to your immediate superior or directly to the concern Managing Director of the Company. You may then be requested to document your report in writing.

If you later believe that you have been subject to discrimination, retaliation or harassment for having made a report under this Policy, you must immediately report those facts to the Chairperson of Audit Committee. It is imperative that you bring the matter to the Company’s attention promptly so that any concern of discrimination, retaliation or harassment can be investigated and addressed promptly and appropriately.

INVESTIGATION

All complaints under this policy will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to the investigation and take any remedial action, in accordance with applicable law. All employees and supervisors have a duty to co-operate in the investigation of reports of such serious misconduct. In addition, an employee shall be subject to disciplinary action, including the termination of their employment, if the employee fails to co-operate in an investigation, or deliberately provides false information during an investigation. If, at the conclusion of its investigation, the Company determines that a violation of policy has been occurred, the Company will take effective remedial action commensurate with the severity of the offence. 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 policy.

DISCRIMINATION, RETALIATION OR HARASSMENT

The Company strictly prohibits any discrimination, retaliation or harassment against any person who reports incidents of such serious misconduct, based on the person's reasonable belief that such misconduct occurred. The Company also strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation of complaints about such serious misconduct.

Any complaint that any managers, supervisors, or employees are involved in discrimination, retaliation or harassment related to the reporting or investigation of serious misconduct, shall be promptly and thoroughly investigated in accordance with the Company's investigation procedures. If a complaint of discrimination, retaliation or harassment is substantiated, appropriate actions, up to and including discharge, will be taken.

RETENTION OF DOCUMENTS

All documents related to the reporting, investigation and enforcement of this policy, as a result of serious misconduct, or of the discrimination, retaliation or harassment of an employee that made such a report, shall be kept in accordance with the Company's record retention policy and applicable law.

ADDITIONAL ENFORCEMENT INFORMATION

The Company's policies and practices have been developed as a guide to our legal and ethical responsibilities to achieve and maintain the highest business standards. Conduct that violates the Company's policies will be viewed as unacceptable under the terms of employment at the Company. Certain violations of the Company's policies and practices could even subject the Company and any individual employees involved to civil and criminal penalties.

MODIFICATION IN THE POLICY

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 laws and regulations and / or accommodation organizational changes within the Company