

## VIGIL MECHANISM AND WHISTLE BLOWER POLICY SWARAJ GREEN POWER AND FUEL LIMITED

### **INTRODUCTION:**

As per the provisions of Section 177(9) of the Companies Act, 2013 read with of Rule 7 of Companies (Meetings of Board and its Powers) Rules 2014, every listed company, the Companies which accept deposits from the public or the Companies which have borrowed money from banks and public financial institutions in excess of fifty crore rupees shall establish a vigil mechanism for directors and employees to report genuine concerns.

Further, Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") provides for a mandatory requirement for all listed companies to establish a mechanism to report genuine concerns to the Corporation for directors and employees.

This Vigil Mechanism / Whistle Blower Policy ("**Policy**" or "**this Policy**") is formulated in order to comply with the Act and the said Rules.

### **SCOPE AND PURPOSE:**

Swaraj Green Power and Fuel Limited ( the "**Company**") is committed to complying with the laws that apply to it, satisfying the Company's Code of Conduct and particularly to assuring 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, both the Company and those working for/or with the Company could face governmental investigation, prosecution, fines, and other penalties. That may have cascading impact and may prove fatal. 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. Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (**the 'Policy' or the 'Vigil Mechanism and Whistle Blower Policy'**).

This policy applies to all Employees, regardless of their location. Violations will result in appropriate disciplinary action. The employees are required to familiarize themselves with this policy and seek advice from the Human Resource Department or Company Secretary of Swaraj Green Power & Fuel Limited, if any question arises.

### **REPORT AT THE EARLIEST - NIP IT IN THE BUD**

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. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations, insider trading, bribery, harassment, discrimination in your employment etc. 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 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.

## HOW & WHERE TO REPORT

The Protected Disclosures under this Policy shall be super scribed as “Confidential Disclosure under Vigil Mechanism / Whistle Blower Policy” and report to (i) your immediate supervisor; (ii) the nodal officer, i.e., the Company Secretary; at [csanjali@swarajindia.co.in](mailto:csanjali@swarajindia.co.in) or (iii) anonymously, by sending an email to: [whistleblower@swarajindia.co.in](mailto:whistleblower@swarajindia.co.in) If you have reason to believe that your immediate supervisor or the Company Secretary is involved in the suspected violation, your report may be made to the Chairman of the Audit Committee at: Chairman, Audit Committee, Swaraj Green Power and Fuel Limited, Gat No 332/B/2, Upalave, Phaltan, Satara 415523.

Because you have several means of reporting, you 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.

## POST REPORTING INVESTIGATION

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.

## PROTECTION OF WHISTLE-BLOWER

- Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee:
  - (a) Discloses his/her identity
  - (b) Discloses the information in good faith
  - (c) Believes it to be substantially true
  - (d) Does not act maliciously nor makes false allegations and
  - (e) Does not seek any personal or financial gain
- The Company will not tolerate any attempt on the part of anyone to retaliate, apply any sanction

or disadvantage or to discriminate against any person who has reported to the Company serious and genuine concern that they may have concerning an apparent wrong doing.

- Any violations of the Code of Conduct of the Company by the complainant after raising the complaint may invalidate the protection provided under this Policy.
- Protection under the Policy shall be available to the employee who raises the concern under this Policy till such time that the complainant's employment subsists with the Company.
- An employee, who wishes to raise a concern in respect of any act of retaliation as defined in this Policy against the concerned employee, can do so within 3 months of such act which he/she believes to be an act of retaliation. After this time period has elapsed, such concerns regarding retaliation, if raised, shall not be treated as a concern under this Policy.
- Any attempt on the part of any employee to misuse the Policy for personal advantage shall be dealt with strictly by the Compliance Officer.

#### **WARNING:**

Any employee or Director, who knowingly makes frivolous, misleading or false complaints, or without a reasonable belief as to the truth or accuracy of the complaint, will not be protected by this Policy and may be subject to disciplinary action including termination of his/ her employment. This will also apply to those Directors and employees, who make false statements or give false evidence during the investigations.

#### **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 national, state or local regulations and / or accommodate organizational changes within the Company.

This policy has been recommended by Audit Committee of the company and has adopted by the board of directors in their meeting held on May 24, 2025.