

LOTTE INDIA CORPORATION PRIVATE LIMITED

CIN:U15419GJ1954PTC153704

Vigil Mechanism Policy

The Vigil Mechanism Policy is created with the objective of providing employees, directors, customers and vendors (hereinafter referred to as Complainants) an avenue to raise concerns which seem to go against the company's commitment to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication. The Vigil Mechanism policy seeks to provide necessary safeguards for protection of employee, directors, customers and vendors from reprisals a victimization, for whistle blowing in good faith.

The purpose of this policy is to provide a frame work to promote responsible and secure whistle blowing. It protects the Complainants wishing to raise a concern about serious irregularities within the company.

The Policy covers malpractices and events which have taken place/ suspected to take place involving:

1. Abuse of authority
2. Breach of contract
3. Negligence causing substantial and specific danger to public health and safety
4. Manipulation of company data/ records
5. Financial irregularities, including fraud, or suspected / potential fraud
6. Criminal offence / illegal activities
7. Pilferage of confidential / propriety information
8. Deliberate violation of law/regulation
9. Wastage/misappropriation of company funds/assets
10. Breach of employee Code of Conduct or Rules
11. Any other unethical, biased, favored, imprudent event
12. Inappropriate financial reporting
13. Violation of internal accounting regulations / system
14. Violation of Code of conduct & Ethics

The Complainant is not expected to prove the truth of an allegation; the complainant needs to demonstrate to the Chief Financial Officer, that there are sufficient grounds for concern. Certain safeguards have been provided which will prevent harassment or victimization of the complainant.

Complainants must put their names to allegations. Anonymous Allegations and Malicious allegations shall not be entertained and may result in appropriate legal

action.

Mr.JEONGKWAN HEO, Chief Financial Officer is the official authorized for receiving all complaints under this policy and ensuring appropriate action. His contact details are given below:

Email: hotline@lotteindia.com

LOTTE INDIA CORPORATION PRIVATE LTD

4/169, Rajiv Gandhi Salai (OMR),
Kandanchavadi, Chennai – 600 096
Phone: 044-45458877

The Authorised person shall appropriately and expeditiously investigate all Complaints received. In this regard, he may appoint senior managerial personnel to investigate into the matter and prescribe the scope and time limit for submission of report.

The Authorised person or the Senior Managerial Personnel, as the case may be, shall have right to call for any information/document and examination of any Complainant as they may deem appropriate for the purpose of conducting investigation under this policy.

If an investigation leads to conclude that an illegal or unethical behaviour, actual or suspected fraud or violation of the Company's Codes or Policies or any improper activity has taken place/has been committed, the authorized person shall recommend to the Management of the Company to take such disciplinary or corrective action as he may deem fit.

Once in a quarter, the CFO / authorized person shall report to the Board of Directors about the Complaints received, pending, settled during the quarter, its investigation, findings and action taken shall be preserved and reported to Audit Committee from time to time.
