



PIRAMAL ENTERPRISES LIMITED

(CIN: L24110MH1947PLC005719)

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Summary of Primal Enterprises Limited - Vigil Mechanism

The Company has implemented a Vigil Mechanism across the organization in compliance with the requirements of section 177 of the Companies Act, 2013 and the Rules prescribed thereunder and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Following is a summary, highlighting the features of the Whistle Blower Policy that comprises the Vigil Mechanism.

1. Under the Whistle Blower Policy ('the Policy'), Employees and Directors of the Company and its subsidiaries can report genuine concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct & Ethics and/or any instances of leak of unpublished price sensitive information, without fear of punishment for such disclosure or unfair treatment.
2. To facilitate an independent and unbiased investigation, the Company has designated the Internal Auditors (M/s Aneja & Associates, an Independent firm of Chartered Accountants) to receive and process complaints received under this Policy and in turn to report to the Chairman of the Audit Committee, who will place the same before the Audit Committee for its consideration and recommendations to the Management. A dedicated email id has been designated for this purpose and communicated to the employees.

Provided that the cases of leak of Unpublished Price Sensitive Information shall be examined as per the policy for procedure of inquiry in case of leak of unpublished price sensitive information adopted by the Company under Regulation 9A of the Insider Trading Regulations.

3. The Policy covers all malpractices and all unethical, illegal or improper activities including but not limited to the following matters:
 - a. Abuse of authority
 - b. Negligence causing substantial and specific danger to public health and safety
 - c. Financial irregularities including fraud or suspected fraud
 - d. Criminal offence
 - e. Pilferation of confidential / proprietary information
 - f. Misappropriation of company funds / property
 - g. Breach of Code of Conduct & Ethics Policy

- h. Sexual Harassment *
- i. Leak of Unpublished Price Sensitive Information **
- j. Any other unethical or immoral or illegal events

*For complaints relating to sexual harassment, employees may use either this Policy or the Sexual Harassment Policy of the Company or both.

**For complaints relating to leak of Unpublished Price Sensitive Information ('USPI'), employees may use either this Policy or the Policy and Procedure of Inquiry in case of leak of UPSI or both.

- 4. The Policy provides for protection of whistle blowers against unfair treatment.
- 5. Investigations shall be carried out in an unbiased manner.
- 6. The Policy contains provisions for disciplinary action against malafide or malicious complaints.
