Chromewell Engineering Private Limited

Whistleblower Protection & Speak-Up Policy

POLICY NO: CW-ETH-003 | VERSION: 4.0

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1. Document Information:

Document Details		Governance
Policy Owner: Head of Compliance	**Scope:** All employees, contractors, suppliers, business partners, and any third party with knowledge of potential misconduct at Chromewell Engineering. Reports may be made from any country in which Chromewell operates or where a reporter has relevant information.	**Reviewed & Approved By:** CEO & CFO
Secondary Owner: Compliance Executive	**Applies To:** All actual or suspected violations of Chromewell's policies, applicable laws, or ethical standards. Includes environmental violations, financial fraud, bribery, discrimination, safety violations, data breaches, and supply chain misconduct.	**Review Cycle:** Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd recognises that employees and other stakeholders are often the first to become aware of potential misconduct, unethical behaviour, or policy violations. This policy establishes Chromewell's formal speak-up mechanism and the protections available to all those who raise concerns in good faith.

Effective whistleblower protection is a legal requirement under the Indian Companies Act 2013 (Section 177 - Vigil Mechanism) and a best-practice element of corporate governance expected by EU and USA buyers, CSRD ESRS G1. Chromewell strongly believes that a trusted speak-up culture is also the most effective early-warning system against conduct that could harm the company, its people, or the environment.

This policy is aligned with:

- Indian Companies Act 2013 - Section 177 (Vigil Mechanism / Whistleblower Policy requirement)
- SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 - Regulation 22
- GRI 2-26 - Mechanisms for seeking advice and raising concerns (2021)
- CSRD ESRS G1 - Business Conduct (reporting channels for concerns)
- ISO 37001:2016 - Anti-Bribery Management Systems (whistleblowing clause 8.9)
- UK Bribery Act 2010 - adequate procedures guidance

3. Scope

This policy covers reports of:

- Bribery, corruption, or facilitation payments - see Policy CW-ETH-002
- Financial fraud, accounting irregularities, or misappropriation of company assets
- Environmental violations - spills, illegal waste disposal, regulatory breaches - see Policy CW-ENV-001
- Health and safety violations that put employees or others at risk - see Policy CW-HSW-001
- Discrimination, harassment, or abuse - see Policy CW-HR-006
- Child labour, forced labour, or human rights violations - see Policy CW-CL-008
- Data privacy breaches or cybersecurity incidents - see Policy CW-ETH-004
- Supply chain misconduct including supplier non-compliance with Chromewell's Supplier Code of Conduct
- Any other actual or suspected breach of Chromewell's policies or applicable law

4. Key Objectives and Targets

Chromewell Engineering defined both key objectives and targets for Speak-Up issues from its own operations and from its supply chain.

Speak-Up Issue	Key Objectives	Target
Accessible Reporting Channels	Provide multiple, accessible reporting channels including a named internal contact, a designated email address, and an anonymous reporting option, ensuring every employee - including those with low literacy or limited technology access - can raise a concern.	Reporting channels: minimum 2 options operational always. (One online website and another physical confidential drop boxes) Anonymous reporting option: available and communicated to all employees Poster with reporting contacts: displayed in all work areas in Marathi, Hindi, and English

Reporter Protection from Retaliation	Protect all reporters who raise concerns in good faith from any form of retaliation - demotion, dismissal, harassment, exclusion, or any other adverse treatment - regardless of the outcome of the investigation.	Retaliation incidents against reporters: zero tolerance All suspected retaliation incidents: investigated within 7 days Reporter identity: protected to the maximum extent practicable in every case
Timely Investigation and Resolution	Investigate all credible reports promptly, impartially, and confidentially, with outcomes communicated to reporters to the extent permitted by confidentiality obligations.	All reports: acknowledged within 48 hours Preliminary assessment: completed within 7 days Full investigation: completed within 30 working days for standard cases Reporter informed of outcome: within 5 working days of investigation conclusion
Awareness and Accessibility	Ensure every employee - including production workers, contract workers, and smallholder supplier workers - is aware of the speak-up mechanism and understands it is safe to use.	Annual speak-up awareness communication: 100% of employees reached Smallholder supplier workers: briefed on Chromewell's grievance channel during supplier onboarding 100% of new employees briefed during induction
Channel Effectiveness and Trust	Monitor the effectiveness and trustworthiness of the speak-up mechanism through annual surveys and report volume tracking, acting on findings that reduce reporter confidence.	Annual reporter trust survey or pulse check: conducted Report volume trend: tracked (neither suppression nor sudden unexplained decrease treated as positive) Zero uninvestigated credible reports

5. Governance and Allocation of Responsibilities

Clear accountability is assigned at every level of Chromewell Engineering's ESG Governance Structure. The table uses a RACI framework (Accountable, Responsible, Consulted, Informed).

Role / Designation	RACI Level	Department	Key Responsibilities Under This Policy
CEO/CFO	**Accountable (A)**	Executive	Final accountability for the integrity of the speak-up mechanism. Receives quarterly summary of reports and investigation outcomes (anonymised). Acts as final escalation for investigations involving senior management.
Head of Compliance	**Primary Owner (R)**	Compliance	Manages the speak-up channel, receives and triages all reports, appoints investigators, tracks investigation timelines, ensures reporter confidentiality, and reports to CEO quarterly.

Compliance Executive	**Secondary Owner (R)**	Compliance	Manages GRI 2-26 / CSRD ESRS G1 disclosure of reporting mechanisms. Tracks environmental and supply chain reports received through the speak-up channel.
Head of HR	**Consulted (C)**	Human Resources	Co-investigates HR-related reports (discrimination, harassment, working conditions). Manages disciplinary process following substantiated findings. Manages the POSH ICC channel.
Board / Audit Committee	**Informed (I)**	Governance	Receives annual summary of speak-up reports and outcomes from the Managing Director. Provides independent oversight of the mechanism's integrity.
All Line Managers	**Responsible (R)**	All Functions	Never retaliate against a reporter. Escalate any report received directly to Head of Legal immediately. Support a speak-up culture in their teams.
All Employees	**Responsible (R)**	All Functions	Report any actual or suspected misconduct through the available channels. They need not be certain of wrongdoing - a genuine good-faith concern is sufficient.

RACI: A = Accountable (signs off, one person only) · R = Responsible (does the work) · C = Consulted (input required) · I = Informed (kept in loop).

6. Policy Commitments

6.1 Reporting Channels

Chromewell provides the following reporting channels for raising concerns:

- Named Compliance Contact: Meghna.Hazra@chromewell.in [+91 7391-082999]
- Confidential Email: Corporate.Communication@chromewell.in - received only by Head of Legal
- Written Report: sealed envelope addressed to Head of Legal - may be deposited in the confidential drop box located at all locations where Chromewell operates
- Anonymous Report: anonymous written report deposited on ChromeNet using the “Report a Concern” tab or using the Hotline form on the website
- POSH ICC (sexual harassment only): Sucheta Dikshit (sucheta.d@exceligent.in)- operated independently of management
- External escalation: where the concern involves senior management, reporters may contact the CEO directly.

6.2 Protection from Retaliation - Non-Negotiable

Chromewell Engineering guarantees the following protections to all reporters acting in good faith:

- No reporter shall be dismissed, demoted, suspended, threatened, harassed, discriminated against, or subjected to any other adverse employment action as a consequence of raising a concern
- These protections apply regardless of whether the reported concern is substantiated - good faith is the criterion, not correctness

- Retaliation against a reporter is itself a serious disciplinary offence; any manager found to have retaliated is subject to enhanced disciplinary action including termination
- Where a reporter believes they have experienced retaliation, they may raise a separate complaint immediately through any reporting channel

6.3 Investigation Process

- All reports are acknowledged within 48 hours of receipt
- The Head of Compliance assesses all reports within 7 days and determines whether a full investigation, referral to line management, or referral to external authority is appropriate
- Investigations are conducted impartially by persons without conflict of interest in the subject matter; where the Head of Compliance is the subject, the investigation is conducted by the CEO or an external party
- Findings are documented; where misconduct is substantiated, proportionate corrective action is taken
- Reporters are informed of the outcome to the extent permitted by confidentiality obligations

6.4 Confidentiality

- Reporter identity is kept strictly confidential and disclosed only where required by law or where the reporter consents
- Investigation findings are shared on a need-to-know basis only
- Records of reports and investigations are retained securely for a minimum of seven years

6.5 Supply Chain and Smallholder Access

- Chromewell's speak-up channel is available to workers at supplier sites - including smallholder workshops and micro-enterprise surface treatment suppliers - who may be aware of violations of Chromewell's Supplier Code of Conduct
- Contact details for the speak-up mechanism are included in all suppliers onboarding packs and the Supplier Code of Conduct, in English and Marathi

7. KPI Monitoring and Reporting

The following KPIs are tracked by the ESG Working Group, reported quarterly to the ESG Steering Committee, and published annually in the Chromewell Sustainability Report

KPI / Indicator	Target	Measurement Method	Cadence	Owner
Total Reports Received	Tracked and disclosed (GRI 2-26)	Legal case register	Quarterly	Head of Compliance
Reports Acknowledged Within 48 Hours	100%	Legal case register	Quarterly	Head of Compliance
Investigations Completed Within 30 Days	100% standard cases	Legal case register	Quarterly	Head of Compliance
Retaliation Incidents Against Reporters	Zero	Legal / HR records	Quarterly	Head of Compliance
Reports by Category	Tracked (ethics, H&S, env, HR)	Legal case register	Annual	Head of Compliance

Reporter Awareness - All Employees	100% annually	HR communication records	Annual	Head of HR
Anonymous Channel Operational	Continuously	Channel audit	Quarterly	Head of Compliance

8. Policy Review Mechanism

Reviewed annually every April by Head of Legal with CEO approval. Interim review triggered by a material retaliation incident, amendment to Indian Companies Act Section 177, SEBI LODR updates, or CSRD ESRS G1 guidance.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

9. Compliance, Non-Conformance, and Disciplinary Action

- Retaliation against any reporter is grounds for disciplinary action up to and including immediate termination for the retaliating party
- Deliberate false reporting made in bad faith (knowingly fabricated) may itself be subject to disciplinary action - this does not apply to good faith reports later found to be unsubstantiated
- Obstruction of an investigation is grounds for immediate termination
- “Report a concern” form available on ChromeNet as an anonymous grievance redressal mechanism and, we have a dedicated hotline number published on the website to report any concern anonymously.

10. Related Documents and References

Internal policies:

- CW-ETH-001 - Business Ethics & Code of Conduct Policy
- CW-ETH-002 - Anti-Bribery & Anti-Corruption Policy
- CW-ETH-004 - Data Privacy, Information Security & Cybersecurity Policy
- CW-HSW-001 - Employee Health, Safety & Wellbeing Policy
- CW-HR-006 - Anti-Discrimination, Harassment & Abuse Policy
- CW-ENV-001 - Environmental Management Policy
- CW-CL-008 - Child Labour, Forced Labour & Human Trafficking Policy

External standards:

- Indian Companies Act 2013 - Section 177 (Vigil Mechanism)
- SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 - Regulation 22
- GRI 2-26 - Mechanisms for seeking advice and raising concerns (2021)
- CSRD ESRS G1 - Business Conduct (reporting mechanisms)
- ISO 37001:2016 - Anti-Bribery Management Systems (Clause 8.9)
- UK Bribery Act 2010 Guidance - Adequate Procedures

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
Name: Ms. Meghna Hazra **Designation:** Compliance Executive **Date:** Jan 2026 **Signature:**	**Name:** Ms. Risha Naik **Designation:** CFO **Date:** Jan 2026 **Signature:**	**Name:** Mr. Amardeep Mardhekar **Designation:** CEO **Date:** Jan 2026 **Signature:**

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.