

(Approved by the Board of Directors on 11th November, 2025)

FEDERAL MOGUL GOETZE (INDIA) LIMITED

WHISTLE BLOWER AND VIGIL MECHANISM POLICY

1. Purpose and Scope

- 1.1. This whistle blower and vigil mechanism policy (“**Policy**”) of Federal Mogul Goetze (India) Limited (“**Company**”) has been adopted by the Company pursuant to Regulation 4(2)(d)(iv) and Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), and Section 177 of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014.
- 1.2. The Company is committed to conducting its business in compliance with applicable law and in accordance with the highest standards of business ethics and management.
- 1.3. This Policy aims to provide to all employees (including their representative body) of the Company and its subsidiaries (“**Employees**”), directors of the Company and its subsidiaries (“**Directors**”), and other persons with whom the Company or any of its subsidiaries have financial or commercial dealings (“**Stakeholders**”) with a mechanism to report any actual or suspected incidents of any illegal or unethical practices by the Employees, Directors, the Company and/or any of its subsidiaries.
- 1.4. This Policy is not intended to cover any grievances of Employees with respect to their employment (including employee compensation) and is only intended to cover concerns that fall within the scope of this Policy.

2. Applicability

This Policy is applicable to all Employees, Directors and Stakeholders.

3. Reporting

- 3.1. Any person (“**Whistle Blower**”) who has a reasonable ground, in good faith, to believe that there has been any actual or suspected incidents of illegal or unethical practices in connection with the business or operations of the Company and / or any of its subsidiaries is entitled to, and encouraged to, report such incident in writing, to the Company Secretary of the Company at his/her email address, along with any relevant evidence, information and details of the incident that such Whistle Blower has in its possession (“**Protected Disclosure**”). In the event the Whistle Blower is not comfortable in making the Protected Disclosure (as stated above), or in exceptional or other appropriate circumstances, the Whistle Blower may make the Protected Disclosure to the chairperson of the audit committee of the Company (“**Audit Committee**”) at his/her email address.
- 3.2. To enable a proper investigation of the alleged incident, the Protected Disclosure should, to the extent possible, contain the following information (to the extent such information is available with the Whistle Blower):
 - 3.2.1. names of the Employee(s) and / or Director(s) and / or Stakeholder involved or suspected to be involved in the alleged incident;
 - 3.2.2. specific details of the alleged incident; and

3.2.3. relevant factual background of the alleged incident along with any evidence, to the extent readily available with the Whistle Blower.

3.3. For the avoidance of doubt, the role of a Whistle Blower under this Policy is limited to submission of the Protected Disclosure and the Whistle Blower is not permitted to engage in any investigation on his / her own accord, or to take any corrective or remedial step with respect to the matters stated in the Protected Disclosure.

3.4. All Protected Disclosures will be scrutinized and investigated by the Company and, if found guilty, appropriate actions shall be taken by the Company against the accused persons, in accordance with the extant Company policies and applicable law.

4. Protection of Whistle Blower and co-operation of Employees

4.1. The Company condemns any act of harassment, discrimination, victimization and other unfair practices against any Whistle Blower. The Company shall endeavour that the Whistle Blower is not subjected to any unfair treatment, including harassment, threat, demotion, suspension, transfer, intimidation or refusal of promotion, solely on account of making a Protected Disclosure under this Policy. The Company shall take appropriate disciplinary actions against any Employee and / or Director who act in a manner contrary to this paragraph 4.1.

4.2. The Whistle Blower, the board of directors of the Company (“**Board**”), the Audit Committee, and other persons involved in the investigation of the matter stated in the Protected Disclosure shall keep the matter (including the details of the Whistle Blower and the Protected Disclosure) confidential. If requested for by the Whistle Blower, and to the extent possible while still enabling investigation of the matter, the Whistle Blower’s identity will be kept confidential (except if required to be disclosed under applicable law or by a court order).

4.3. The Whistle Blower may also be required to provide evidence in disciplinary proceedings or appropriate court proceedings and the Whistle Blower must co-operate in such proceedings. Other Employees and Directors shall also co-operate in any investigation that may be conducted by the Company pursuant to any Protected Disclosure.

4.4. No person shall oversee any investigation of the matter stated in the Protected Disclosure if such person has a conflict of interest in such investigation.

5. Anonymous complaints

While the Whistle Blower is encouraged to disclose its name in the Protected Disclosure, the Protected Disclosure may also be made anonymously. The Company Secretary or the chairperson of the Audit Committee, as the case may be, shall consider an anonymous Protected Disclosure if, in its reasonable discretion, such Protected Disclosure shows credibility, gravity, or any other factor which merits such consideration.

6. Oversight

The Audit Committee shall oversee the implementation of this Policy and in the event any member of the Audit Committee has a conflict of interest with respect to any Protected Disclosure or any matter under this Policy, such member shall recuse themselves from the matter they are interested in.

7. Not in good faith

If the Protected Disclosure is found to be made by the Whistle Blower in bad faith, or is found to be malicious or vexatious, appropriate disciplinary action shall be taken against such Whistle Blower. It is clarified that no action is to be taken against the Whistle Blower if the Protected Disclosure is found to be untrue, provided that it is made in good faith and upon reasonable grounds by the Whistle Blower.

8. Disclosures

The Company shall disclose this Policy, as required under the Listing Regulations, on its website and shall provide the details of this Policy in its annual report and the Board's report.

9. Amendment, Review and Effectiveness

- 9.1. This Policy will be subject to review and revisions as may be deemed necessary by the Board or the Audit Committee, and as required under the applicable law. In the event of any conflict between the terms of this Policy and applicable law (including the Listing Regulations), the provisions of applicable law shall prevail.