



# **ELECTRONICS MART INDIA LIMITED**

## **Vigil Mechanism / Whistle Blower Policy**

## 1. Policy Overview:

The Vigil Mechanism Policy of Electronics Mart India Limited ([EMIL-Policy](#)) provides a secure, confidential and transparent process for Directors and Employees to report genuine concerns about unethical conduct, fraud, misconduct or violation of laws, regulations or Company policies. It promotes ethical behaviour, accountability and compliance with the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The policy aims to ensure that concerns are raised and addressed without fear of retaliation.

## 2. Who Can Report?

All Directors and Employees of the Company, including permanent, contractual, temporary, trainees, and consultants, are eligible to make protected disclosures under this policy.

## 3. What to Report?

Reportable matters include, but are not limited to:

- Unethical, illegal, or improper conduct
  - Actual or suspected fraud or corruption
  - Questionable accounting or auditing matters
  - Misuse/abuse of authority or Company assets
  - Breach of Company policies or Code of Conduct
  - Violation of applicable laws, rules or regulations
  - Acts causing financial loss or reputational damage to the Company
- Malpractice or misconduct falling outside ethical/legal violation (e.g., personal or career grievances) are excluded from this mechanism.

## 4. How to Report – Channels & Email Addresses?

### Primary Reporting Channels

Complaints should be submitted in writing to the Vigilance and Ethics Officer (Company Secretary & Compliance Officer) via:

- **Email:** [cs@bajajelectronics.in](mailto:cs@bajajelectronics.in) or [vigilance@bajajelectronics.in](mailto:vigilance@bajajelectronics.in)
- **Sealed Letter:** Marked “*Private and Confidential – Vigil Mechanism*” and delivered to:  
Electronics Mart India Limited,  
6-3-666/A1 to 7, 1st Floor, Opp. NIMS Hospital, Punjagutta Main Road, Hyderabad –  
500082.

### Escalation Option – Audit Committee

In exceptional or sensitive cases, complaints may be addressed directly to the Chairperson of the Audit Committee via:

- **Email:** [auditcommittee@bajajelectronics.in](mailto:auditcommittee@bajajelectronics.in)
- **Sealed Letter:** Marked “*Private and Confidential*” and delivered to the same Hyderabad address above.

#### **Reporting Requirements:**

- Complaints should contain clear, factual information, relevant details, dates, and supporting documents where possible.
- Anonymous or pseudonymous disclosures are not entertained; reporters are encouraged to provide their name and contact details.

#### **5. Investigation and Action:**

- All complaints are formally recorded and investigated impartially and confidentially.
- The Vigilance and Ethics Officer initially investigates within 15 days.
- Investigations are completed normally within 90 days, extendable as needed.
- The person against whom allegations are made is informed, given a fair hearing, and cooperates with the process.
- If an investigation substantiates misconduct, the Audit Committee recommends disciplinary or corrective actions to the Board, in accordance with Company procedures.

#### **6. Safeguards and Whistle Blower Protection:**

- Complainants will not face victimisation or retaliation for reporting in good faith.
- The Company maintains confidentiality of the complainant’s identity to the extent legally permissible.
- Individuals assisting in investigations receive equivalent protections.
- Any deliberate false or malicious disclosure may lead to disciplinary action against the complainant.