

WHISTLE BLOWER POLICY

A. INTRODUCTION

Ramky ARM Recycling Private Limited (the “Company”) is committed to lawful and ethical behavior in its everyday activities. This Policy is applicable to all directors, officers, employees, agents, representatives, and other associated persons of the Company (which may include consultants, advisors and temporary employees) (collectively “Company Personnel”).

The Company expects all Company Personnel to act in accordance with all applicable laws, regulations, and Company policies, and to observe the highest standards of business and personal ethics in conducting their duties and responsibilities. The Company therefore expects and requires any Company Personnel who have knowledge of, or reason to suspect, any violation of law or the Company’s Policies to report such concerns to the Chief Compliance Officer immediately. Reports may be made anonymously. If any Company Personnel fail to report known or suspected violations, then the relevant Company Personnel may be subject to disciplinary action, up to and including termination.

It is the Company’s policy that, if the report of known or suspected violations is made honestly and in good faith, no adverse employment-related action will be taken against any Company Personnel in retaliation for reporting a violation or suspected violation of anti-corruption laws or this Policy.

All concerns raised by Company Personnel shall be treated with strict confidence and the Company shall take disciplinary action up to and including termination for anyone who threatens or engages in retaliation, retribution, or harassment of any other person who has reported or is considering reporting a violation under this Policy.

B. CATEGORIES OF COMPLAINTS TO BE REPORTED

Company Personnel are free to report, without fear of retaliation, any concerns or issues, or any inappropriate act or conduct, whether actual, potential, or suspected. This list is not exhaustive. However, the list below is intended to provide a sample of the types of misconduct that should be reported under this Policy:

- Violations of the Company’s Anti-Bribery and Anti-Corruption Policy;
- Acceptance of or giving kickbacks or bribes by Company Personnel or the Company’s business partners;
- Violations of Company policy by the Company’s agents, vendors, and business partners;
- Misappropriation of funds;
- Fraudulent accounting of transactions;
- Unauthorized use of money or funds;
- A criminal offence or an unlawful act;
- Abuse of position or conflicts of interest for any unauthorized use or for personal gain, e.g., favoring a related party for a contract;
- Sexual Harassment;

- Bullying.

C. ROLES AND RESPONSIBILITIES

Though Company Personnel are expected to report potential violations of Company policy, whistleblowers should not act on their own in conducting any investigation. The Company takes all complaints seriously and will investigate all reports made pursuant to this Policy as appropriate. Whistleblowers may remain anonymous if they choose to do so. However, the Company may in certain circumstances ask that whistleblowers cooperate with any investigation conducted under this Policy, including by providing additional information relating to any report of potential violations. Depending on the circumstances, the Company may provide the whistleblower with information regarding the results of any investigation made pursuant to a report under this Policy, including any remedial actions taken.

D. REPORTING AND INVESTIGATION

If any Company Personnel has reason to believe that he/she has become aware of any concern or misconduct of any nature as shared above, he/she should immediately do one of the following: (i) email concerns ethics.reel@ramky.com; leave a voice message at +91 8096875557 describing the concern, or (iii) contact the Chief Compliance Officer directly.

E. DISCRIMINATION, RETALIATION OR HARASSMENT

The Company strictly prohibits any discrimination, retaliation or harassment against any person who raises a report under this policy. It is imperative that any victim of such discrimination, retaliation or harassment brings the matter to the Chief Compliance Officer's attention promptly so that the matter can be investigated and addressed promptly and appropriately.

F. TREATMENT AGAINST FALSE COMPLAINTS

A whistleblower who knowingly makes a false complaint or allegations may be subject to disciplinary action.

G. RETENTION

All documents relating to the reporting, investigation and enforcement of this Policy shall be maintained under the supervision of the Chief Compliance Officer.

H. ADDITIONAL ENFORCEMENT INFORMATION

In addition to the Company's internal complaint procedure, employees should also be aware that certain law enforcement agencies are authorized to review questionable accounting or auditing matters, or potentially fraudulent reports of financial information. Nothing in this policy is intended to prevent an employee from reporting information to the appropriate agency when the employee has reasonable cause to believe that the violation of a statute or regulation has occurred.

I. APPLICABILITY OF LOCAL LAWS

In instances where the local law contradicts this Policy, the local law prevails. This Policy should be read and applied in conjunction with the Company's Anti-Bribery and Anti-Corruption Policy and Gifts & Entertainment Policy. In instances where this Policy is more restrictive than the applicable rules and regulations, Company Personnel are required to abide by this Policy.

Company Personnel should contact the Chief Compliance Officer with any questions relating to this Policy.