

WHISTLEBLOWER POLICY / VIGIL MECHANISM ANKIT INDIA LIMITED

CIN: L15500WB1981PLC033900

(Company listed on The Calcutta Stock Exchange Limited)

1. PREAMBLE

This Whistleblower Policy / Vigil Mechanism ("Policy") has been formulated in accordance with the provisions of Section 177 of the Companies Act, 2013 and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time. Ankit India Limited ("the Company") believes in conducting its affairs in a fair, transparent, ethical and lawful manner and is committed to developing a culture where employees and stakeholders are encouraged to report genuine concerns.

2. OBJECTIVE

The purpose of this Policy is to: Provide a mechanism for Directors, employees and stakeholders to report unethical behaviour, fraud, violation of laws, regulations or Company policies; Provide adequate safeguards against victimisation of persons who use such mechanism; Ensure fair and independent investigation of complaints received; and Protect the identity and confidentiality of the whistleblower.

3. APPLICABILITY

This Policy shall apply to all Directors, employees, consultants, vendors, customers and other stakeholders of the Company.

4. REPORTABLE MATTERS

The following matters may be reported under this Policy: Fraud or suspected fraud; Misappropriation of Company assets; Violation of Company policies or Code of Conduct; Manipulation of financial records; Breach of confidentiality; Conflict of interest; Corruption, bribery or unethical conduct; Leak or suspected leak of unpublished price sensitive information (UPS); and Any other unlawful or improper activity.

5. REPORTING MECHANISM

Complaints may be reported in writing or through email to the designated Whistleblower Committee or Compliance Officer of the Company. The complaint should contain sufficient details and supporting evidence to facilitate investigation. Anonymous complaints may be considered if supported by adequate evidence.

6. INVESTIGATION PROCESS

Upon receipt of complaint, the Whistleblower Committee shall examine the matter and conduct necessary investigation either directly or through authorised persons. The Audit Committee shall oversee the functioning of the vigil mechanism. Appropriate disciplinary or corrective action may be taken against persons found guilty after completion of investigation.

7. PROTECTION TO WHISTLEBLOWER

No employee or person reporting a genuine concern under this Policy shall be subject to retaliation, discrimination, harassment or adverse employment consequences. Any act of victimisation against a whistleblower shall be treated as a serious misconduct.

8. CONFIDENTIALITY

The identity of the whistleblower, contents of complaint and investigation proceedings shall be kept confidential to the extent possible and permitted under law.

9. FALSE COMPLAINTS

Any person making false, frivolous or malicious complaints knowingly shall be subject to disciplinary action in accordance with applicable policies and laws.

10. ACCESS TO AUDIT COMMITTEE

In exceptional cases, a whistleblower may directly approach the Chairman of the Audit Committee.

11. REVIEW AND AMENDMENT

The Board of Directors reserves the right to amend or modify this Policy in whole or in part at any time in accordance with applicable laws.

12. EFFECTIVE DATE

This Policy was approved by the Board of Directors of Ankit India Limited at its meeting held on **29th May, 2025** and shall come into effect immediately.

For Ankit India Limited

Sd/-
Managing Director