

WHISTLE BLOWER POLICY

1. Preamble

This Policy is framed in compliance with the provisions of Section 177(9) of the Companies Act, 2013, read with Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Objective

The Policy is intended to:

- To provide for safe avenues for all directors and permanent employees to raise concerns when violations take place directly or indirectly, intentionally or otherwise, which would bring disrepute to the Company
- To provide necessary safeguards for protection to directors and permanent employees from victimization for whistle blowing in good faith.

3. Applicability

This policy shall be applicable to all permanent employees and directors of the Company

4. Scope of Whistle Blowing

This mechanism may be invoked for reporting, inter alia:

- Actual or suspected fraud or financial irregularities
- Leakage or suspected leakage of unpublished price sensitive information
- Violations of the Code of Conduct or applicable policies
- Unethical, unlawful, or improper practices
- Acts that may harm the Company's reputation

5. Reporting Authority

The complaining employees should submit the report raising the concern either to (a) The Chief Financial Officer who is also the functional Head or b) The Company Secretary by an email to sramasubramanian@impal.net and secy@impal.net respectively. If the complaint is either against any one of the Access Persons, then it can be made to the Managing Director of the Company. if the complaint is against the Managing Director, it can be made to the Chairman of the Audit Committee of the Company. Directors or employees, when they blow the whistle, they should send the complaining report to the Chairman of the Audit Committee.



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6. Timelines for Reporting

Concerns should be reported promptly upon occurrence or discovery of the matter, and in any case within a reasonable period, not exceeding two months from the date of the incident.

7. Reporting Procedure

The report should, to the extent possible, include:

- Nature and details of the suspected violation
- Names of individuals involved
- Relevant supporting documents or evidence
- Time period during which the incident occurred

The Complainant may be required to furnish additional information during the course of the investigation.

8. Investigation process:

All reports under this Policy will be investigated promptly by the Audit Committee. The Audit Committee shall make a detailed examination of the findings. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. Reasonable and necessary steps will also be taken to prevent any further violations.

9. Safeguards against victimization:

1. No adverse action shall be taken or recommended against a Complainant in retaliation to his blowing the whistle. Harassment/victimisation of the Complainant will constitute sufficient ground for dismissal of the concerned employee.
2. Source of information shall be disclosed to facilitate investigation.
3. Every effort will be made to protect the complainant's identity subject to any legal constraints that may arise from time to time.

10. Amendment and Review

This Policy shall be subject to periodic review by the Audit Committee and may be amended as deemed necessary, with the approval of the Board of Directors.

