

JAYNIX ENGINEERING PRIVATE LIMITED

WHISTLEBLOWER POLICY

Approved by the Board of Directors on March 14, 2023

For the purposes of this Whistleblower Policy, references to “Jaynix” mean Jaynix Engineering Private Limited and all its subsidiaries. Jaynix will attempt to ensure that this Policy is brought to the attention of all relevant people.

Whistle Blowing

1. Jaynix’s Code of Business Conduct and Ethics requires every director, officer, and employee of Jaynix to report any violation of the Code which is known to or reasonably suspected by that individual. Directors, officers, and employees must also report any other known or reasonably suspected improper conduct or incident in relation to Jaynix, including any questionable accounting, internal accounting controls or auditing matters or potential violations of the law. Any matter that should be reported is referred to as an “Improper Activity”.

“Vigilance Officer” is a person, nominated/appointed to receive protected disclosures from complainant, maintaining records thereof, placing the same before the director nominated to play the role of Audit Committee for its disposal and informing the complainant the result thereof.

Reporting Procedures

2. Employees should immediately report Improper Activity:

- (a) To their immediate supervisor, or
- (b) To their immediate supervisor’s manager, or
- (c) To the Chief Financial Officer of Jaynix, including in a situation where an employee is not satisfied with the actions taken by his or her supervisor or supervisor’s manager. Employees can also choose instead or additionally to report Improper Activity to the Chair of the Board or the Vigilance Officer of Jaynix.

3. Officers should immediately report Improper Activity:

- (a) To the Chief Financial Officer of Jaynix, or
- (b) To the Chair of the Board or the Vigilance Officer of Jaynix.

4. Directors should immediately report Improper Activity to the Chair of the Board or the Lead Director of Jaynix.

5. The contact information for the Chief Financial Officer, the Chair of the Board and the Lead Director is as follows:

(a) Contact by email. Communications may be sent to the following email addresses, which are confidential to the respective individual addressees:

Chief Financial Officer - Kaushik.Lodaya@Jaynix.com

Chair of the Board- Nikhil@Jaynix.com

Vigilance Officer- Uma@Jaynix.com

(b) Contact by mail or other physical delivery. Communications may be mailed or delivered, addressed to the intended recipient:

C/o Jaynix Engineering Private Limited, 171, Horizon Industrial Park, Off NH 48, Bamangam - Por, Vadodara 391 210

Any such communication will be delivered by Jaynix, unopened, to the intended recipient. Directors, officers, and employees may also make reports regarding Improper Activity on a confidential and anonymous basis to the Board of Jaynix.

Investigations

6. All reports will be taken seriously. Jaynix will ensure that suitable guidance is available to anyone that receives a report and that appropriate procedures are in place for investigating and tracking reports. Jaynix will ensure that every report will be promptly and thoroughly investigated. The actions taken by Jaynix with respect to a particular report will depend upon the nature of the report. The report may be investigated internally by management, by the Board or an appropriate committee of the Board or be referred to the police and/or the appropriate regulatory authorities. Management will report quarterly to the Board on reports received and the status of outstanding investigations.

7. All information reported and disclosed during an investigation will remain confidential and made available only on a need-to-know basis, except as necessary to conduct the investigation and to take any remedial action, and subject to any applicable law (that can compel disclosure in some circumstances). All directors, officers and employees have a duty to cooperate in the investigation of reports of Improper Activity.

8. If, at the conclusion of its investigation, Jaynix determines that Improper Activity has occurred, Jaynix will take effective remedial action equal to the severity of the offence. This action may include disciplinary action against the accused party up to and including termination and reporting to police and/or regulatory authorities.

9. Jaynix acknowledges that those who file reports need to be assured that their report has been properly addressed. Accordingly, subject to any legal constraints, Jaynix will provide the complainant with appropriate information about the outcome of any investigation within a reasonable period (except in cases where the report was filed anonymously).

Retention

10. All documents related to the reporting, investigation, and enforcement of this Policy will be kept in accordance with Jaynix's applicable policies and applicable law.

No Retaliation

11. This Policy is intended to encourage and enable directors, officers, and employees of Jaynix to raise serious good faith concerns without fear of adverse consequences to them by virtue of raising those concerns. Accordingly, Jaynix will not carry out or, to the fullest extent reasonably within its power, permit any retribution or retaliation of any kind against any individual for submitting any report in good faith.

For, Jaynix Engineering Private Limited

Mr. Nikhil Arun Diwakar

(Managing Director, DIN: 02017432)

Address: 4, Orchid Apartment, Gangapur Road,
Near Gangapur Road Police Station, Sawarkar Nagar,
Nashik - 422013, Maharashtra, India

Place: - Vadodara

Date: - 14/03/2023