

VIGIL MECHANISM POLICY

INTRODUCTION

This Vigil Mechanism Policy is established for SHV Energy Private Limited (hereinafter referred to as "the Company") to comply with the provisions of the Companies Act, 2013. It is prepared in alignment with SHV's global Speak Up Policy (hereinafter referred to as the "Speak Up Policy"), which is based on Dutch and EU legislation and extends to all stakeholders of SHV companies worldwide.

SCOPE

This Vigil Mechanism Policy is specifically designed for the employees and directors of the Company and establishes a structured framework for reporting concerns through designated reporting channels. It ensures that issues are directed to the appropriate officer within the Company and includes adequate safeguards against victimisation of employees and directors who use the vigil mechanism.

REPORTABLE CONCERN

A reportable concern is any concern or issue that may be viewed as a breach of:

- 1) SHV's Purpose: "Courage to care for generations to come" and values: Integrity, Trust, Curiosity, Inclusivity and Passion.
- 2) Any applicable code of conduct.
- 3) Any SHV, Group, or business unit policies and guidelines applicable to the Company.
- 4) Any laws, rules, or regulations applicable to the Company.

or any other genuine concern or grievance which are not mentioned above.

This also includes situations in which a previously reported concern has not been properly dealt with, or in which the public interest in general is or could be at stake. Reported concerns should always be based on reasonable grounds and good faith.

REPORTING PROCEDURES

Any employee or director of the Company who wishes to report a concern (hereinafter referred to as "the Reporter") should first attempt to address it directly with the person involved, if appropriate. If that is not feasible or comfortable, the Reporter may report the concern to a manager, HR advisor, or the Ethics & Compliance Officer of the Company.

Additionally, in line with the provisions of the Companies Act, 2013, this Vigil Mechanism Policy allows for direct access to the nominated Director. This provision is specifically for appropriate or exceptional cases where it is necessary to escalate the concern beyond the regular channels mentioned above.

For the purpose of the above, it is hereby clarified that the nominated Director shall be the Director who holds the designation of CEO of the Company at any given point of time.

It is pertinent to mention that if reporting through the above-mentioned channels could lead to a conflict of interest or bias, or if these channels are ineffective, the Reporter has the right to raise/escalate the concern in accordance with the Speak Up Policy.

REPORTING CHANNELS

Reporters may raise the concerns with the individuals specified in the Reporting Procedures via Email, Mobile, Message, or through Virtual or In-Person Meetings. Additionally, in accordance with this Policy and Speak Up Policy, the Reporters have the right to raise/escalate issues through SHV Speak Up Portal, accessible at <https://www.shvspeakup.com/> and also accessible at Manthan intranet portal of the Company.

ADEQUATE SAFEGUARDS AGAINST VICTIMISATION

The Company is committed to safeguarding individuals who report concerns in good faith. This includes:

- 1) **Anonymity:** Allowing Reporters the option to report concerns anonymously.
- 2) **Confidentiality:** Protecting the identity of Reporters and maintaining confidentiality to the extent possible.
- 3) **Protection against Retaliation:** Ensuring that no retaliatory or adverse actions are taken against individuals for reporting concerns or participating in investigations.

APPLICABILITY OF SPEAK UP POLICY PROVISIONS

All provisions outlined in the Speak Up Policy that are not explicitly covered in this Policy shall mutatis mutandis apply to the Company. This implies that while certain specifics may be adjusted to fit the context of this Policy, the core principles, procedures, and standards set forth in the Speak Up Policy will continue to govern and be enforceable. This ensures consistency and alignment with the broader ethical framework and compliance expectations established by SHV, thereby supporting a unified approach to managing and addressing concerns across all relevant policies.



INCONSISTENCIES WITH SPEAK UP POLICY

In the event of any inconsistencies between the Speak Up Policy and this Policy, the Speak Up Policy shall prevail. However, if such inconsistencies arise due to provisions mandated by the Companies Act, 2013 and any rules made thereunder, this Policy shall prevail only to the extent that it conflicts with the Companies Act, 2013 and any rules made thereunder.

REVIEW AND AMENDMENTS

The Board of Directors of the Company shall review and amend this policy to address any changes in the regulatory environment, business practices, or organizational needs. Any amendments will be communicated to all employees and directors to ensure continued compliance and awareness.