

DISCLOSURE ON VIGIL MECHANISM

Section 177(9) of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 provides the requirement to establish Vigil Mechanism for Directors and Employees to report concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct.

For this purpose, the Company has adopted the ANAND Code of Conduct ("the Code") and MAHLE Business Code ("MAHLE Code"), which lays down the principles and standards that govern the actions of the Company and its employees. Any actual or potential violation of the code, howsoever insignificant or perceived as such, is a matter of serious concern for the Company. The role of the employees in pointing out such violations of the Code cannot be undermined. There is a provision under the Code requiring employees to report violations, for which an Ethics Committee has been constituted and a 24 hour 'ANAND Group Ethics Helpline' has been provided to employees to report any unethical activity. ANAND Group Ethics Helpline is operated by 'Integrity Matters', India's leading Whistle-blower Hotline / Ethics Helpline company dedicated to promoting ethics and good governance through technology solutions.

Contact details for ANAND Group Ethics Helpline are as follows:

Ethics helpline India (Toll-free) number: 1800-102-6969; Email: AnandEthicsHelpline@integritymatters.in

Web access: <https://anandethicshelpline.integritymatters.in>

Postal address: ANAND Automotive Pvt. Ltd., C/o Integrity Matters, Unit 1211, Centrum, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West 400 604, Maharashtra, India

Contact details for MAHLE Ethics Helpline are as follows:

At present the Regional Compliance Committee at MAHLE India includes Mr. Milind Mukund Godbole, Mr. Jakob Ruemmler, Mr. Yogesh Sharma, Mr. Amit Tomar, Mr. Sharad Bhatia, Mr. Vinayak Hegde, Mr. Bhalchandra, Ms. Monika Sachdeva Arora and Ms. Shibi Mathew.

When reporting violations, employees can besides the internal reporting channels (Supervisor, Legal Department, Regional Compliance Office, Corporate Compliance Office) can also contact an external lawyer ('Ombudsman') at:

S. No.	Name	Email	Contact no.
1.	Mr. Harman Sandhu	harman.sandhu@amsshardul.com	09871792738
2.	Mr. Vivek Agarwal	vivek.agarwal@amsshardul.com	09971696526