

COMPLIANT REDRESSAL UNDER VIGIL MECHANISM POLICY

As per Section 177(9) of the Companies Act, 2013 and Regulation 22 of the Listing Obligations and Disclosure Requirements, Regulation 2015, every listed company and such class or classes of companies, as may be prescribed by the Ministry needs to formulate a Vigil Mechanism Policy for their directors, stakeholders and employees and their representative bodies as to report their genuine concerns in such manner as may be prescribed.

Any stakeholder who becomes aware of any unethical practice or suspected violation of any law is encouraged to report his/her concerns to the below mentioned officials crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws.

The scope of policy also covers raising of any incident involving leak or suspected leak of unpublished price sensitive information or unethical use of UPSI in accordance with SEBI (Prohibition of Insider Trading) Regulations, 2015 including any amendment thereof.

The reporting of concerns can be addressed to following:

1. The Company Secretary and Compliance Officer

Mr. Suman Kumar E.V.P. (Corporate Affairs), Company Secretary & Compliance Officer

SMC Global Securities Limited

8B, Netaji Subhash Marg Daryaganj Delhi-110002

Email id: whistleblower@smcindiaonline.com

Contact No. 011-30111333, Ext -7728/7729

In exceptional cases and where the disclosure pertains to the Compliance Officer of the Company, the report must be forwarded to:

2. Chairman of Audit Committee

Mr. Hari Das Khunteta

Independent Director & Chairman of Audit Committee

SMC Global Securities Limited

8B, Netaji Subhash Marg Daryaganj Delhi-110002

Email id: hdkhunteta@gmail.com

Your report should include as much information about the suspected violation as you can provide. Where possible, it should describe the nature of the suspected violation, the identities of persons involved in the suspected violation, a description of documents that relate to the suspected violation, and the time frame during which the suspected violation occurred. In some circumstances, you may be contacted for further information.