

## WHISTLE BLOWER POLICY

### Complaints and the Investigation Procedures

The following procedures have been adopted by the Audit Committee of **The Madras Aluminium Company Limited** (the ‘Company’) to govern the receipt, retention, and treatment of Complaints and to protect the confidential, anonymous reporting of the same. These policies and procedures apply to and are available to all employees of the Company, its subsidiaries and all external stakeholders.

#### I. POLICY

Employees have the opportunity to submit / report ‘Complaints’ pertaining to the following areas such as:

- a) Fraud (an act of willful misrepresentation which would affect the interests of the concerned) against investors, securities, fraud, mail or wire fraud, bank fraud, or fraudulent statements to the Securities and Exchanges Board of India (the “SEBI”), the relevant stock exchanges, any other relevant authority or members of the investing public.
- b) Violations of any rules and regulations applicable to the Company and related to accounting, internal accounting controls and auditing matters.
- c) Intentional error or fraud in the preparation, review or audit of any financial statement of the Company.
- d) Any violations to the Company’s ethical business practices as specified in the Company’s Code of Conduct policy
- e) Any other event which would affect the interests of the business

The company will protect the confidentiality and anonymity of the complainant to the fullest extent possible with an objective to conduct an adequate review. External Stakeholders such as vendors, customers, business partners etc. have the opportunity to submit ‘Complaints’. However the Company is not obliged to keep complaints from non-employees confidential or to maintain the anonymity of non-employees. We encourage individuals sending ‘Complaints’/raising any matter to identify themselves instead of sending anonymous complaints as it will assist in an effective complaint review process.

Post review, if the ‘Complaint’ is found to be have been made with *mala fide* intention, stringent action will be taken against the complainant. We encourage employees to report genuine ‘Complaints’ and those submitted in good faith.

## II. PROCEDURES

### Receipts of Complaints

All the 'Complaint' under the policy should be reported to the Group Head - Management Assurance who is independent of operating management and businesses. The contact details are as follows:

Group Head - Management Assurance,  
Vedanta, 75 Nehru Road  
Vile Parle (E), Mumbai 400 099  
Tel No. + 91-22-66461000  
Fax No. + 91-22-66461450

'Complaints' can also be sent to the designated E-Mail ID: [malco.whistleblower@vedanta.co.in](mailto:malco.whistleblower@vedanta.co.in) the custodian of E-Mail ID will be Group Head - Management Assurance. If a 'Complaint' is received by any other executive of the Company, the same should be forwarded to the Group Head - Management Assurance at the above address.

### Treatment of Complaints

1. Head - Management Assurance shall review the 'Complaint', and may investigate it himself or may assign another employee, any committee outside counsel, advisor, expert, or third party service provider to investigate, or assist in investigating the 'Complaint'. Head - Management Assurance may direct that any individual assigned to investigate a 'Complaint' work at the direction of or in conjunction with Head - Management Assurance or any other attorney in the course of the investigation.
2. The person/persons against or in relation to whom the 'Complaint' is made shall co-operate with the investor and have the right to provide their inputs during the investigation.
3. At least once in every six months and whenever also as deemed necessary, Head - Management Assurance shall submit a report to the Audit Committee and any other member of Company Management that the Audit Committee directs to receive such report, that summarizes each 'Complaint' made within the last 12 months and shows specifically: (a) the complainant (unless anonymous, in which case the report will so indicate), (b) a description of the substance of the 'Complaint', (c) the status of the investigator, and (e) findings and recommendations.

### Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with 'Complaint' are considered confidential information and access will be restricted to members of the Audit Committee.

Group Head - Management Assurance and any other person as permitted by the Group Head - Management Assurance. 'Complaints' and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at that time.

### **Retention of Records**

All documents relating to such 'Complaint's made through the procedures outlined above shall be retained for at least five years from the date of the 'Complaint', after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case the information will be retained for the duration of that litigation, inquiry, or investigation and therefore as necessary.

### **Amendment to the policy**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without any reason whatsoever and the same will be posted on the company website.

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Approved by the Board of Directors of MALCO in their meeting held on April 29, 2008

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