

WHISTLE BLOWER / VIGIL MECHANISM POLICY

The Purpose of this Policy:

Welcast Steels Limited ("WSL") and its subsidiaries (collectively the "Company") are committed to complying with the foreign and domestic laws that apply to them, satisfying the Company's Code of Conduct and Ethics, and particularly to assuring that business is conducted with integrity and that the Company's financial information is accurate. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, both the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties. That can be costly. Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (the "Policy" or the "Whistleblower Policy").

Duty to Report:

Every employee is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company's Code of Conduct and Ethics. This includes possible accounting or financial reporting violations, insider trading, bribery, or violations of the anti-retaliation aspects of this Policy. Retaliation includes adverse actions, harassment, or discrimination in your employment relating to your reporting of a suspected violation.

It is the policy of the Company that one must, when one reasonably suspects that a violation of an applicable law or the Company's Code of Conduct and Ethics has occurred or is occurring, report that potential violation. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws.

Following is list of exemplified suspected violations:

- Violation of any law or regulations, policies including but not limited to corruption, bribery,
- Theft, fraud, coercion and willful omission.
- Rebating of Commission/benefit or conflict of interest.
- Procurement frauds.
- Mismanagement, Gross wastage or misappropriation of company funds/assets.
- Manipulation of Company data/records.
- Misappropriating cash/company assets; leaking confidential or proprietary information.
- Unofficial use of Company's property/human assets.
- Activities violating Company policies. (Including Code of Conduct)
- A substantial and specific danger to public health and safety.
- An abuse of authority or fraud
- An act of discrimination or sexual harassment

How to Report:

Company has nominated Mr.Yash Raj, CFO of the Company has the Chief Vigilance Officer.

One must report all suspected violations in person to Mr.Yash Raj or anonymously by sending an e-mail to: yashraj@welcaststeels.com

or by sending an anonymous letter marked 'Confidential' to:

Mr.Yash Raj
Welcast Steels Limited
Plot No.15, Phase -1,
Peenya Industrial Area,
Bengaluru-560 058

Investigations after the Report:

All reports under this Policy will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

Document Retention:

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

Modification:

The Audit Committee or the Board of Directors of WSL can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with federal, state or local regulations and / or accommodate organizational changes within the Company.