

TVS LOGISTICS SERVICES LIMITED

CIN: U63011TN2004PLC054655

VIGIL MECHANISM

Objective

- a) To provide for safe avenues for all employees to raise concerns when violations take place directly or indirectly, intentionally or otherwise, which would bring disrepute to the strong edifice built by TVS Logistics Services Limited ("Company"), on the foundations of high standards of integrity, dedicated customer service, fair business practices, efficient, safe and trusted financial policies, highest levels of compliance with all applicable laws in letter and spirit.
- b) To provide necessary safeguards for protection to the employees from victimization for whistle blowing in good faith.

Applicability

This policy shall be applicable to all employees of the Company.

Main features

- 1) To be used for reporting any serious actual or suspected frauds, concerns relating to financial matters/ reporting, unethical or illegal conduct or actual or possible violation of code of conduct / ethical standards; actions which are not in line with the applicable policies of the Company, actions which would affect the Company's image or reputation, actions which are in the nature of harassment or actions that would amount to serious improper conduct.

2) Whistle Blowers

Employees making disclosure under this policy is referred to as "Whistle Blower" or "Complainant". The Whistle Blower has to demonstrate or provide sufficient grounds for his / her concern, but should not make any malicious allegations which would result in disciplinary action.

3) Whom to Report

The Complainant should submit the report raising the concern to the Deputy Managing Director of the Company.

4) When to Report

The Complainant shall raise the issue immediately / promptly but within a reasonable period of the event / action / finding but not later than 45 consecutive days.

5) How to Report

The report should include as much information about the suspected violation. 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. The Complainant may be required to give further information.

6) **Making a protected disclosure**

Any employee covered by this policy may make a disclosure in writing, duly addressed to the Deputy Managing Director as early as possible, but not later than 45 consecutive days after becoming aware of the issue, through email/letter.

The Complainant must put his / her name to allegations, for timely resolution of the issue and for ensuring that adequate protection is granted to him / her under the policy. No anonymous allegation will be entertained.

The written disclosure must ensure the following:

- disclosure to be typed or written in legibly either in English or Hindi or in regional language of place of employment.
- clear understanding of the issue is brought out.
- actual facts are explained in the issue, and it is not merely speculative.
- specific information is provided to the maximum extent to allow conduct of Investigation.
- financial or other impact (if any) to be detailed.
- in case the issue was previously brought out, outcome of the same.

Contact Details

Deputy Managing Director, TVS Logistics Services Limited, No. 58, Eldams Road, Teynampet, Chennai-600 018

7) **Investigation**

All reports under this policy will be investigated promptly by the Deputy Managing Director or any committee formed by the Deputy Managing Director at his discretion.

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 offence. Reasonable and necessary steps will also be taken to prevent any further violations.

8) **Safeguards against victimization**

- i) No adverse action shall be taken or recommended against a Complainant in retaliation to his/her blowing the whistle. Harassment / victimization of the Complainant will constitute sufficient ground for dismissal of the concerned employee.
- ii) Source of information to the Complainant shall be disclosed to facilitate investigation.
- iii) Every effort will be made to protect the Complainant's identity subject to any legal constraints that may arise from time to time.
- iv) This policy will also be reviewed by the Audit Committee based on necessity.