

**LA TIM METAL & INDUSTRIES LIMITED**  
**(Formerly Known as Drillco Metal Carbides Limited)**  
**Whistle Blower Policy/Vigil Mechanism**

- **Objective**

The Company is committed to ensure compliances of all the applicable laws, Code of Corporate Governance & Ethics adopted by it and policies and procedures framed by it from time to time, by the Directors and employees of the Company.

Purpose of this policy is to provide a framework through which all the Directors and employees report their genuine concerns and actual/potential violations to the designate officials of the Company fearlessly, as provide in Section 177 of the Companies Act, 2013 and Rules made thereunder.

The policy neither releases directors and employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

- **Definitions**

The definitions of some of the key terms used in this Policy are given below. Capitalized terms not defined herein shall have the meaning assigned to them under the Code.

- a. **“Audit Committee”** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 292A of the Companies Act, 1956 and read with Clause 49 of the Listing Agreement with the Stock Exchange (s)
- b. **“Employee”** means every employee of the Company (whether working in India or abroad),  
including the Directors in the employment of the Company.
- c. **“Code”** means the La Tim Metal & Industries Limited (Formerly known Drillco Metal carbides Limited) Code of Conduct
- d. **“Investigators”** mean those persons authorised, appointed, consulted or approached by the Ethics Counsellor/Chairman of the Audit Committee and includes the auditors of the Company and the police.
- e. **“Protected Disclosure”** means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

- f. **“Subject”** means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.
- g. **“Whistle Blower”** means an Employee making a Protected Disclosure under this Policy

- **Eligibility**

Any Whistle blower means any Director or any Employee of the Company is eligible to make Protected Disclosures under the Policy. The Protected Disclosures may be in relation to matters concerning the Company.

- **Coverage of Policy/ Protected Disclosure that Can be Made:-**

- Deliberate or unintentional non compliance of the applicable laws,
- Improper and unlawful practices,
- Cases of Frauds,
- Financial and accounting irregularities,
- Misappropriation of Company's funds,
- Violation of Code and Ethics inter- alia non disclosure of conflict of interest or indulging in insider trading.

- **Lodging of Complaints**

Complaints on the matters listed in Coverage/ Protected Disclosures including anonymous, can be directly reported/lodged with the following official:-

**Name:** - Mr. Rahul Timbadia, Managing Director

**Address:-** La Tim Metal & Industries Limited (Formerly known as Drillco Metal Carbides Limited)

201, Navkar Plaza, Bajaj Road, Vile Parle (West), Mumbai, Maharashtra, -  
400056

**Phone No. :-** 022-26203399

**Email Id:-** [accounts@drillcometal.com](mailto:accounts@drillcometal.com)

- **Investigation Procedure**

- All the complaints received by the designated officials as above shall be logged.

- The designated officials will suitably investigate the complaint and take appropriate action.
- The designated officials will send copy of the complaint, investigation report and the action taken report to the Chairman of the Audit Committee.
- The designated officials shall also declare to the Audit Committee that the person engaged for carrying out investigation is not a whistle blower or complainant.
- The Audit Committee may chose to initiate further investigation.
- In case of conflict of interest between the Audit Committee members, the remaining members of the Audit Committee shall deal with the matter.
- The Audit Committee, if it deems fit, may engage an independent external agency to conduct investigation.

- **Protection and Safeguards**

Both the designated officials and the Audit Committee shall ensure

- Protection of complainant/witness, if any, against any harassment and victimization.
- Protection of the complainant identity

- **Frivolous Complaints**

The designated officials shall take suitable action against the complainant for any frivolous complaint.

- **Amendment**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees unless the same is notified to the Employees in writing.

- **Miscellaneous**

- All the relevant documents namely complaint or the gist of oral complaint, as the case may be, information / document obtained during the investigation as evidence, including from witness, if any shall be fully secured to avoid shall be preserved for a period of 2 (Two) years.

- In exceptional cases as may be decided by the designated officials after considering the facts of such cases, the whistle blower/ complainant shall be provided direct access to Chairman of the Audit Committee.

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