

ESTABLISHMENT OF VIGIL MECHANISM AND WHISTLE BLOWER  
AT GULF OIL LUBRICANTS INDIA LIMITED ("GOLIL" or "Company")

Gulf Oil Lubricants India Limited (the "**Company**") is committed to adhere to the highest standards of ethical, moral and legal principles for the purpose of ensuring efficiency in the conduct of its business operations in a fair and transparent manner. The Company has adopted the Code of Conduct for Directors and Senior Management ("**code of conduct**") which lays down the general principles and standards that should govern the actions of the Company and its employees and lays emphasis on adoption of the highest standards of personal ethics, integrity, confidentiality and discipline in dealing with matters relating to the Company. Any actual or potential violation of the code of conduct, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company. The role of the employees in pointing out such violations of the ethical behavior cannot be undermined.

Section 177(9) of the Companies Act, 2013 requires every Listed Company to establish a vigil mechanism for its Directors and Employees to report their genuine concerns.

In compliance with Regulation 22 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and related provisions of the Companies Act, 2013 and rules made thereunder, the Company has adopted Whistle Blower and Vigil Mechanism policy for Directors and Employees of the Company.

The Company has established a secured system to enable Directors and Employees to report their genuine concerns, generally impacting / affecting business of our Company, including but not limited to improper or unethical behavior / misconduct / actual or suspected frauds / violation of Company's code of conduct.

All protected disclosures concerning financial or accounting matters should be addressed, in writing, to the Chairman of the Audit Committee of the Company for investigation.

In respect of all other protected disclosures, those concerning the Ombudsman and employees at the levels of senior Vice President and above should be addressed to the Chairman of the Audit Committee of the Company and those concerning other employees should be addressed to the Ombudsman of the Company. The Ombudsman may refer the matter to the Chairman of the Audit Committee depending upon the importance of the matter.

The contact details of the Chairman of the Audit Committee and of the Ombudsman of the Company are as under:

**Ms. Kanchan Chitale**  
**Chairman of Audit Committee,**  
Gulf Oil Lubricants India Limited  
Address: IN Centre, 49/50, MIDC,  
12<sup>th</sup> Road, Andheri (East),  
Mumbai 400093  
e-mail : [Chairmanauditco@gulfoil.co.in](mailto:Chairmanauditco@gulfoil.co.in)

**Mr. Sudhanshu Tripathi**  
**Group President-Human Resources, Hinduja Group**  
**Ombudsman,**  
C/o Company Secretary  
Gulf Oil Lubricants India Limited  
Address: IN Centre, 49/50, MIDC,  
12<sup>th</sup> Road, Andheri (East),  
Mumbai 400093  
e-mail : [Ombudsman@gulfoil.co.in](mailto:Ombudsman@gulfoil.co.in)

Whistle Blowers must put their names to allegations as follow - up questions and investigation may not be possible unless the source of the information is identified. Disclosures expressed anonymously will NOT be investigated.