

We pioneer motion

Annex to Guidance

INDIA WHISTLEBLOWING SYSTEM

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1 What is the India Whistleblowing Annex?

This Annex to the Guidance Whistleblowing (Annex) describes how the local reporting system of the Schaeffler Group (Schaeffler) is implemented at Schaeffler India Limited:

This Annex amends the process specified by Group Instruction IN000003 *Dealing with Leads of compliance Violations and Internal Investigations* and the *Schaeffler Guidance Whistleblowing* to assure compliance with India whistleblowing laws and its requirements for handling local whistleblowing reports.

In the event of any conflict between this Annex and Group Instruction IN000003 *Dealing with Leads of compliance Violations and Internal Investigations* and the *Schaeffler Guidance Whistleblowing*, this Annex shall prevail.

Pursuant to applicable provisions of section 177 of the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (hereinafter may be referred as 'Listing Regulations'), every listed Company is required to establish a Whistleblower Policy / Vigil Mechanism for the directors and employees to report genuine concerns or grievances about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct or Ethics Policy. This Annex is destined to specify and complement the abovementioned group regulations accordingly.

Please note: Schaeffler India Limited is a listed entity and offers its own local reporting channel along with the central reporting channel, hosted by Compliance, Forensics & Investigations department, available at [SpeakUp](https://schaeffler.speakup.report/en-GB/speakup-line/home) (<https://schaeffler.speakup.report/en-GB/speakup-line/home>).

2

To whom does this Annex apply and which information may be reported under this Annex?

This localized Annex applies to

The Vigil Mechanism is required to provide for adequate safeguards against victimization of directors and employees who follow such mechanism and also make provisions for direct access to the Chairperson of Audit Committee in appropriate or exceptional cases.

This Annex intends to cover serious concerns that could have a severe impact on the operations and performance of the business of the Company, like malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of the Company rules, manipulations, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of which the interest of the Company is affected and which are formally reported by whistle blowers. This Annex also complements the existing Schaeffler whistleblowing system as well as the process for investigation into leakage / suspected leakage of unpublished price-sensitive Information as contained in Code on Prohibition of Insider Trading of the Company, framed under SEBI (Prohibition of Insider Trading) Regulations, 2015.

This Annex covers malpractices and events which have taken place/suspected to have taken place including but not limited to the following:

- Abuse of authority
- Breach of conduct
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of the Company's data/records
- Financial irregularities, including fraud, or suspected fraud
- Criminal offence
- Pilferage of confidential/proprietary information
- Deliberate violation of law/regulation
- Wastage/misappropriation of the Company's funds/assets
- Breach of Employee Code of Conduct/Ethics Policy or Rules
- Any other unethical, biased or discriminatory event
- Leak or suspected leak of Unpublished Price-sensitive Information

This Annex should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

3 How to make a report on Reportable Concerns?

3.1 Receipt and disposal of protected disclosures

3.1.1 All Protected Disclosures under this Annex ("Protected Disclosures") should be reported in writing by the whistleblower as soon as possible after the whistleblower becomes aware of the same so as to ensure a clear understanding of the issues raised which may either be typed or written in a legible handwriting preferably in English, Hindi or regional language.

3.1.2 The Protected Disclosure must be submitted in a closed and secured envelope and should be superscripted as "Protected Disclosure under the Whistle Blower Policy". Alternatively, the same can also be sent through email with the subject "Protected Disclosure under the Whistleblower Policy". If the complaint is not superscripted and closed as mentioned above, it will not be possible to protect the Whistleblower and the Protected Disclosure will be dealt with as if it is a normal disclosure. In order to protect the identity of the Whistleblower, the Whistle and Ethics Officer will not issue any acknowledgement to the Whistleblower. The Whistle and Ethics Officer may seek further clarification, if required from the Whistleblower.

3.1.3 The Protected Disclosure should be forwarded under a covering letter signed by the Whistleblower to the Whistle and Ethics Officer, who shall detach the covering letter bearing the identity of the Whistleblower and process only the Protected Disclosure.

3.1.4 All Protected Disclosures should be addressed to the Whistle and Ethics Officer of the Company. weo.india@schaeffler.com Address: Schaeffler India Limited, 15th Floor, ASTP (Amar Sadanand Tech Park), Baner, Pune – 411045

3.1.5 A Protected Disclosure against the Whistle and Ethics Officer should be addressed to the Chairman or the Managing Director of the Company and the Protected Disclosure against the Chairman or the Managing Director of the Company should be addressed to the Chairperson of the Audit Committee. Address: Schaeffler India Limited, 15th Floor, ASTP (Amar Sadanand Tech Park), Baner, Pune – 411045

Email: Chairman of the board: chairman.bm@schaeffler.com

Email: Audit committee chairperson: chairperson.acm@schaeffler.com

Email: Managing director.

3.1.6 The recipient of the Protected Disclosure shall ensure that a record of the Protected Disclosure is maintained and ascertain from the Whistleblower whether he was the person who made the Protected Disclosure or not. The record will include:

- Brief facts;
- Whether the same Protected Disclosure was raised previously;
- Details of actions taken for processing the complaint;
- Findings of the Whistle and Ethics Officer;
- The recommendations of the Audit Committee, if any.

3.2 Investigation

- 3.2.1 All Protected Disclosures reported under this Annex will be thoroughly investigated by the Whistle and Ethics Officer, who will investigate / oversee the investigations
- 3.2.2 The decision to conduct an investigation by itself is not an acceptance of the charge or accusation and is to be treated as a neutral fact-finding process because the outcome of the investigation may or may not support such charge or accusation.
- 3.2.3 The identity of a suspect will be kept confidential to the extent possible given the legitimate needs of the investigation.
- 3.2.4 Unless there are compelling reasons not to do so, suspects will be given reasonable opportunity of being heard during the investigation. No allegation of wrongdoing against a suspect shall be considered as maintainable unless there is good evidence in support of the allegation.
- 3.2.5 Suspects shall have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the suspect(s).
- 3.2.6 The Whistle and Ethics Officer shall ensure completion of the investigation within 45 days of the receipt of protected disclosure. When the Whistle and Ethics Officer is of the opinion that more time is required, he shall (for reasons recorded in writing), extend the period of investigation by maximum 30 days.
- 3.2.7 The Whistle and Ethics officer shall inform the Whistleblower of the outcome of the investigation, either in person or in writing as appropriate, considering the interest of the organization. A Whistleblower who is not satisfied with the outcome of the investigation may appeal to the Managing Director or to the Chairperson of the Audit Committee who may for reasons to be recorded in writing order a review of the investigation or declare the matter as closed.
- 3.2.8 In case of leakage or suspected leakages of unpublished price-sensitive information, the inquiry/ investigation shall be initiated on becoming aware about such leakage or suspected leakage, with or without any protected disclosures received from any whistle blower in this regard.

Please note: The central reporting channel which is administered by the central Compliance Forensics & Investigations department at Herzogenaurach, Germany, at [SpeakUp \(https://schaeffler.speakup.report/en-GB/speakup-line/home\)](https://schaeffler.speakup.report/en-GB/speakup-line/home) (please see the Schaeffler's Guidance Whistleblowing for more details) remains available.

The central reporting channel is specifically available for reporting "Group-Relevant Compliance Violations," which include particularly severe, actual, or suspected acts such as:

- Corruption of public officials
- Violations of antitrust law
- Money laundering or terrorism financing activities
- Systematic violations of books & records and reporting obligations
- Systematic violations of data protection laws and regulation
- Systematic violations of export control law
- Systemic violations of human rights or environmental law

Group relevance is also indicated where general management levels or several legal entities are involved.

Reports filed via the central reporting channel will be processed in accordance with Group Instruction *IN000003 Dealing with Leads of Compliance Violations and Internal Investigations* and the *Schaeffler Guidance Whistleblowing*. As Schaeffler AG is incorporated in Germany, the handling of these reports is governed primarily by German or directly applicable European law, such as GDPR or EU Directives transposed into national law.

4
Is anonymous reporting allowed?

Yes, in this regard there are no deviations from the Guidance Whistleblowing.

5
Is the information kept confidential?

Access to the personal data of the Whistleblower and any third parties referenced in the report is strictly limited to those with a "need to know." This means that information will only be shared with individuals whose responsibilities require them to have access to it.

As the Compliance Forensics & Investigations department is authorized by the Whistle and Ethics Officer to investigate reports submitted locally, investigation team members are considered to have a "need to know" regarding information relevant to the investigations they assist.

The "need-to-know" principle also governs disclosure of information in reports that are likely to have implications for the wider group, especially when collaboration with other departments is necessary. Before disclosing such information, the legitimacy of the request for the data must be determined.

Anonymized sharing of factual information is not restricted.

6
Are Whistleblowers protected differently than to the Whistleblowing Guidance?

Yes, also within the scope of the Annex, retaliation against Whistleblowers is strictly prohibited.

If a Whistleblower experiences a professional disadvantage following a report or disclosure, it is legally presumed that the disadvantage constitutes retaliation for the report or disclosure. However, this presumption only applies if the Whistleblower alleges that the potential disadvantage imposed by the employer is retaliatory in nature.

Protection against retaliation extends to non-employees acting as Whistleblowers.

7
Who will follow up on the reports and what happens next?

The Whistle and Ethics Officer is the local contact point for potential Whistleblowers who decide to report locally. Besides the above mentioned procedure the Whistle and Ethics Officer receives reports via the electronic reporting tool if a local reporting option is selected. If a report was received in person, the Whistle and Ethics Officer will register the report within the electronic reporting tool.

If so assigned by the Whistle and Ethics Officer, the Compliance Forensics & Investigations department at Schaeffler AG in Herzogenaurach, Germany, may investigate a report received through local reporting channels on behalf of the local Schaeffler entity. If a "Group-Relevant Compliance Violation" is potentially involved, the Whistle and Ethics Officer will escalate the report to the Compliance Forensics & Investigations department.

Despite any central involvement, the local Schaeffler entity, acting through the Whistle and Ethics Officer, remains independent in its communication with the reporter (e.g., providing feedback and follow-up within statutory deadlines) and in all follow-up actions and decisions related to the investigation's outcome (e.g., disciplinary measures).

Therefore, for all reports that may not be considered a Protected Disclosure, the Whistle and Ethics Officer will issue an acknowledgement of receipt to the Whistleblower no later than seven (7) calendar days following the receipt of the report.

Furthermore, the Whistle and Ethics Officer provides feedback to the Whistleblower within three months of acknowledging receipt to the extent reasonable and permitted by data privacy laws and regulations, about the planned or completed actions taken in response to their report and the rationale behind those actions. If the investigation is ongoing within this timeframe, the Whistleblower will receive a high-level status update.

8
What happens to the report – how long is it stored?

The personal data of the Whistleblower, including the data provided within the report will be deleted once it is no longer necessary for the purpose it was collected for unless, inter alia, there is a legal obligation or a right to keep the data.

9
Reference to external
reporting bodies

N/A