

**ISHWARSHAKTI HOLDINGS &
TRADERS LIMITED**

**Vigil Mechanism Policy/
Whistle Blower Policy**

1. LEGAL FRAMEWORK:

As per Section 177 of the Companies Act, 2013 and Regulation 22 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”) every listed company needs to establish a vigil mechanism.

Accordingly, pursuant to Section 177 of the Companies Act, 2013 and Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, a Vigil Mechanism and Whistle blower Policy (“the Policy”) has been formulated with a view to provide a mechanism for Directors and employees of the Company to approach the Chairman of the Audit Committee of the Company and report genuine concerns like unethical behaviour, actual or suspected, fraud or violation of the company’s code of conduct or ethics policy.

The Vigil mechanism is implemented not only as a safeguard to unethical practices. This mechanism is intended to provide mechanism for reporting genuine concerns or grievance and ensure that deviations from the Company’s Business Conduct Manual and Values are dealt with in a fair and unbiased manner as provided in Section 177 (9) and (10) of the Companies Act, 2013 and the Companies Rules, 2014. The mechanism is also intended to cover the Whistle blower Mechanism aspect of the SEBI’s Listing Agreement.

2. APPLICABILITY & COVERAGE:

Any employee or Director can report a concern, but with the relevant evidence and in good faith, under this Policy. However, since reporting may result in an investigation affecting the privacy rights of an employee, it is expected that reporters act in a responsible manner in reporting what they feel are genuine cases (and not to settle personal agendas). This Policy covers malpractices, any act of impropriety and abuse or wrongdoing by an employee or a group of employees, if any person in good faith believes and has evidence on any of the following: (this is not a comprehensive list but is intended to illustrate the sort of issues that may be raised under this Policy)

1. Fraud and misconduct regarding financial and accounting matters;
2. Embezzlement/theft;
3. Falsification of contracts, complaints and records, including employment and education records;
4. Corruption;
5. Conflict of interest;
6. Misuse of Company’s assets and resources;
7. Unfair treatment of Customers/Suppliers;
8. Securities related violations including insider trading;
9. Violation of anti-competition and anti-trust laws;

10. Misconduct regarding the protection of the environment or compromise of health & safety;
11. Sexual Harassment of any kind; and
12. Unfair Employment practices

3. **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 and directors unless the same is notified to the Employees and directors by replacing the Policy with amended one on the website of the Company.

The Vigil Mechanism and Whistle-blower Policy was reviewed and updated vide Board resolution passed on February 04, 2026.

Place: Mumbai

Date: February 04, 2026