
VIGIL MECHANISM POLICY

举报机制政策

1. Purpose / 目的

In line with the requirement of the Companies Act, 2013, this policy shall establish a vigil mechanism by standardizing the process of reporting concerns. This policy shall also give clarity on the authority of various departments. In case any violation is reported, it shall also ensure protection to the Person who Reports (PR). The policy shall also establish investigation process of violation of law and disciplines (applicable to Sany India) so reported thereby helping in preventing in corporate risks and protecting corporate interests. / 根据《2013 年公司法》的要求，为建立举报机制、规范举报和调查流程、明确相关部门职权、保护举报人、防范公司风险、保护公司利益，制定本政策。

2. Scope / 范围

- 2.1 This policy shall cover all internal and external reporting of violations of laws and disciplines. The Board of Directors (“**Board**”) of Sany India shall be the ultimate authority for implementation of the policy. / 本政策涵盖所有对内外部违规行为的举报。三一印度董事会（“董事会”）是执行该政策的最终权力机构。
- 2.2 The violations shall include, but shall not be limited to, the violations of laws, disciplines and regulations applicable to Sany India and shall also include infringement of company's interests by internal and external personnel. This shall cover acts including but not limited to corruption, bribery, embezzlement, theft, destruction of property, and fraudulent acts, etc. / 违规行为包括但不限于违反适用于三一印度的法律、法规和规定的行为，如内外部人员侵犯公司利益、腐败、贿赂、贪污、盗窃、毁坏财产和欺诈等。

3. Responsibilities / 职权

- 3.1 This policy authorizes the Board to take necessary steps to ensure implementation of this policy. This includes communication of the policy, receiving violations/concerns, protecting the identity of PR, investigation of violations, punishment to violators, communication of the outcome of investigation and action taken against violations and improvement in processes to avoid such violations in future. / 本政策授权董事会采取必要措施确保执行该政策，包括宣贯政策、接受举报、保护举报人、调查违规行为、惩罚违规者、通报调查结果、针对违规行为采取行动、改进流程以避免未来发生此类违规行为等。

3.2 The Board shall appoint such person, as may deem fit, for effective implementation of policy to achieve the object of this policy for such period and under such instruction as it may deem fit. / 董事会任命其认为合适的人员，在其认为合适的期限内根据其认为合适的指示有效实施政策，以实现本政策的目标。

3.3 All business units and functional departments shall actively cooperate to carry out investigations, accountability and rectification, etc. / 各业务单位和职能部门要积极配合开展调查、问责和整改等工作。

4. Communication of the policy / 政策宣贯

The person who is made responsible by the Board shall communicate this policy to the relevant stakeholders by means which will reach the widest audience possible and can use print and electronic media to enable such communication. / 董事会指定的负责人应尽可能广泛地将本政策宣贯给利益相关者，可使用印刷和电子媒体进行宣贯。

5. Receiving violations/concerns / 接受举报

While communicating the policy, the person responsible for communication shall also communicate the means through which the violation/concerns can be reported/received which is given in Annex 1. These means should however be such that the identity of PR is not revealed. All such violation/concerns received must immediately be reported to the Board Members through a first information report. For detailed process, please refer Sr. No. 1, 2 and 3 of table at para No. 11. / 在宣贯政策时，负责宣贯的人员应传达附件 1 中的举报方式。这些举报方式不应暴露举报人的身份。收到的举报，必须立即通过一手信息报告呈报给董事会成员。详细流程，请见第 11 部分的第 1、2 和 3 条。

6. Protecting the identity of PR / 保护举报人

It should be the prime responsibility of the Board and the person appointed by the Board to protect the identity of PR. For details on protection to PR, please refer Sr. No. 1 of table at para No. 11. / 保护举报人是董事会任命的人员的主要责任。详细信息，请见第 11 部分的第 1 条。

7. Investigation of violations / 违规行为调查

The Board shall on receipt of the first information report of the violations/concerns direct the person responsible to commence the unbiased investigation in to the alleged violations/concerns. The person shall be responsible to update the Board on the progress of the investigation and close the investigation in timely manner. The person shall follow the principles of the natural justice by giving an opportunity of heard to the

person alleged with violation/concerns. For detailed process, please refer Sr. No. 4, 5 and 6 of table at para No. 11. / 董事会在收到举报的一手信息报告后，指定人员对举报事项进行公正调查。该人员负责向委员会通报调查进展情况，按时结项，并遵循自然公正原则为被举报人提供陈述机会。详细流程，请见第 11 部分的第 4、5 和 6 条。

8. Punishment to violators / 对违规人员的处罚

Based on the finding of the investigation and report submitted by the person, the Board shall take cognizance of the investigation outcome and the person, if found guilty, shall be punished in accordance with the Sany Group policy. / 根据调查情况和调查人员提交的报告，董事会将认定调查结果。如果发现违规人员，应根据三一集团政策予以处罚。

9. Communication of the outcome of investigation and action taken against violations / 通报调查结果并针对违规行为采取行动

Depending on the sensitivity of the issue, the Board may decide the need for communicating the outcome of the investigation and the action taken against the violations. The decision of the Board on this matter shall be final and binding. For detailed process, please refer Sr. No. 7 and 8 of table at para No. 11. / 根据问题的敏感性，董事会可决定是否需要通报调查结果并针对违规行为采取行动。董事会的决定应为最终决定，具有约束力。详细流程，请见第 11 部分的第 7 和第 8 条。

10. Improvement / 改进

Based on the analysis of the reason leading to such violation, the Board may require the relevant officers to further strengthen the existing processes to avoid such violations/concerns in future. For detailed process, please refer Sr. No. 9 and 10 of table at para No. 11. / 根据对导致违规行为的原因分析，董事会可要求相关人员进一步优化现有流程，以避免未来发生此类行为。详细流程，请见第 11 部分的第 9 和第 10 条。

11. Process Control / 控制流程

序号 SN	活动 Act.	规则 Rules	角色 Role	输入 Input	输出 Output	文件 Docu.
1	Start / 开始	1) All employees of Sany India and of individuals that have business relations with Sany India can report: ① dishonest behavior or suspected violations of national laws and regulations or company policies of Sany employees, ② violation of the legitimate rights and interests of Sany India by individuals that have business relations with Sany. /三一印度				

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		所有员工及与公司发生业务关系的单位或个人，均可举报公司员工不诚信行为及涉嫌违反国家法律法规和公司制度的行为，以及与公司发生业务关系的单位或个人侵犯我司合法权益的行为。 2) The PR shall provide the basic facts and basis of the reported party in detail. / 举报人应详细提供被举报人的基本事实和依据等。 3) The company encourages and advocates real-name reporting, and also accepts anonymous reporting. The company strictly keeps the relevant information of the PR confidential and protects the PR. If necessary, according to the PR's wishes, help PR who may be or have been retaliated change jobs and regions; any person who retaliates against PR or hypothetical PR will be degraded, changed to another job, removed from the position, or dismissed as appropriate. If it constitutes a crime, it shall be transferred to the judicial authority for criminal responsibility. / 公司鼓励、提倡实名举报，也接受匿名举报。公司对举报人的相关信息进行严格保密，对举报人予以保护。必要时可根据举报人的意愿，帮助可能或已经遭受打击、报复的举报人调换工作岗位、区域；对任何打击、报复举报人或假想举报人的人员视情况予以降级、调岗、撤职、开除等处分；构成犯罪的，移送司法机关追究刑事责任。 4) For reports without any factual basis and with obvious framing, slander, exclusion and other subjective malicious, the company will hold the malicious PR accountable. / 对没有任何事实依据且存在明显陷害、诽谤、排挤等主观恶意的举报，公司将追究恶意举报人相关责任。 5) The Board or the Board nominated personnel shall give full play to their subjective initiative, and discover clues to problems by themselves through routine investigations and interviews. / 董事会及其任命的人员可充分发挥主观能动性，通过例行调查、访谈等形式自行发现问题线索。 6) Relevant clues of problems assigned by company leaders, transferred by other departments, and discovered internally shall be implemented in accordance with these regulations. / 公司领导交办、其他部门转办、内部发现的问题线索，按照本政策执行。				
2	Register / 受理 登记	1) The Board uniformly accepts reports. The Board publishes information for receiving reports. The PR can choose any	RAS / 举报受理专员	Report Letter / 举报信	Reporting Registration Form	RRF / 举报事项登记表

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		method to report. / 董事会统一受理举报，董事会公布举报途径，举报人可以选择任一方式举报。 2) When accepting the PR's face-to-face report, it shall be done separately, and the Report Acceptance Specialist (RAS) shall make a note and record the sound if necessary; when receiving a report by telephone, it shall be carefully asked and answered, and clearly noted, and the sound can be recorded if necessary; reporting letters, e-mails and written materials submitted shall be disassembled, registered and processed in a timely manner. / 接受举报人当面举报时，应单独进行，受理人员做好笔录，必要时可以录音；接受电话举报，必须仔细接听，询问清楚，做好笔录，必要时可以进行录音；对举报信函、电子邮件举报和提交的书面材料，应逐件拆阅、登记、及时处理。 3) The RAS uniformly registers all valid reporting information and enters it into the register. / 举报受理专员统一登记所有有效举报信息，录入登记簿。			(RRF) / 举报事项登记表	
3	Feedback / 受理反馈	1) The RAS conducts a preliminary analysis of the content of the report. For reports that do not fall within the scope of acceptance of this policy, the RAS shall explain the situation to the PR and not accept the report. / 举报受理专员初步分析举报内容，对于不属于本政策受理范围的举报，应向举报人说明情况并不予受理。 2) The RAS communicates with the PR and gives feedback on the acceptance status within 1 working day from the date of receiving the report information, reports the progress of the investigation to the PR every 7 days from the date of initiation of the investigation. / 举报受理专员收到举报信息之日起 1 个工作日内与举报人沟通、反馈受理情况，启动调查之日起每 7 日向举报人反馈调查进展情况。	RAS / 举报受理专员	RRF / 举报事项登记表	RRF / 举报事项登记表	
4	Distribution / 分配	1) The Board nominated personnel to investigate according to the nature, urgency, and credibility of the reported content. / 董事会根据举报内容的事件性质、紧急程度、可信程度等，任命人员进行调查。 2) The Board nominated personnel deals with the reported issues in order according to the importance, the PR corporation, the real-name reporting priority and the principle of cost-effectiveness (see annex 2). / 董事会任命人员依照重要性、举报人配合度、实名举报优先性、成本效益原则，按顺序处理举报问题，具体详见附件 2。	Board Nominated personnel / 董事会任命人员	RRF / 举报事项登记表	Report Content / 举报内容	

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		3) For major integrity violations (real-name) reporting, priority shall be given to initiate the investigation within 3 working days. /对于重大廉洁违纪（实名）举报信息，应优先安排在 3 个工作日内启动调查。				
5	Filing /备案	1) For reports that cannot be investigated because of that the object of the report is unknown, the content of the report is empty, etc., there is no need to carry out circulation and investigation. The RAS records and communicates with the PR in a timely manner. If the PR can further provide detailed and clear report content, the investigation shall continue. /对于举报对象不明、举报内容空洞等完全无去展开调查的举报，可不进行流转、调查，由举报受理专员备案记录，并及时与举报人沟通、说明。如举报人能进一步提供详细、明确的举报内容，应继续安排调查。 2) 对于涉及 A 类风险或问题的举报，应报审计监察总部总监备案。 / Reports involving Type A risks or problems shall be submitted to the Director of the ASHQ for filing.	RAS /举报受理专员	Report Content / 举报内容	Report Content / 举报内容	
6	Investigation / 调查	1) The Board nominated personnel communicates with the PR within 1 working day after receiving the report information, and closes the investigation of Type A report within 30 days from the date of initiation of the investigation (15 days for Type B, 7 days for Type C, and 3 days for Type D). If it cannot be completed on time due to special reasons such as complex cases, the investigation period can be extended to 60 days with the approval of the MD. If it still cannot be completed on time, the investigation period can be extended with the approval of the Board, and the specific extension period depends on the actual situation. / 调查人员收到举报信息之日起 1 个工作日内与举报人取得联系，启动调查之日起 30 日内对 A 类举报调查结项、15 日内对 B 类举报调查结项、7 日内对 C 类举报调查结项、3 日内对 D 类举报调查结项。因案件复杂等特殊原因不能按期完成的，报经董事总经理同意后，可延长调查期限至 60 天；仍不能按时完成的，报董事会同意延长调查期，具体延长期视实际情况而定。 2) The Board nominated personnel shall have a strong sense of confidentiality, and fully protect the relevant information of the PR and the reported materials during the investigation process. It is strictly forbidden to disclose the reporting materials and relevant information of the PR to the reported department, the reported person and their superiors. When investigating the situation with the reported department or the reported person, the original or photocopy of the reported	Board Nominated personnel / 董 事会任命人 员	Report Content / 举报内容	Supervision Report (Communication) 监察报告（沟通 稿） /	Temporary Supervision Matters Transfer Form, Application for Case Filing /临 时性监察事项 流转表、立案 申请书

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		materials shall not be presented. When checking the situation with the PR, it shall be kept confidential and conducted without revealing the identity of the PR. For reports that require special confidentiality, unnominated personal is not allowed to inquire about each other at will. In case of intentional or unintentional disclosure of the investigation status or the PR information during the investigation process, the Board nominated personnel shall be degraded, changed to another job, removed from the position, or dismissed as appropriate. / 董事会任命人员应具有强烈的保密意识，调查过程中充分保护举报人、举报材料的相关信息。严禁将举报材料和举报人的相关情况透漏给被举报部门、被举报人及其上级部门；向被举报部门或被举报人调查情况时，不得出示举报材料原件或复印件；向举报人核查情况时，应做好保密工作、在不暴露举报人身份的情况下进行；对于需要特别保密的举报，未安排负责调查的工作人员不得随意相互打探；在调查过程中有意或无意泄露调查情况、举报人信息等的，对董事会任命人员视情况予以降级、调岗、撤职、开除等处分。 3) If the report is not true or the reported problem is obviously minor, fill out the "Temporary Supervision Matters Circulation Form" and submit it to the Board for approval to close the project. /对举报不属实或举报问题显著轻微的，填写《临时性监察事项流转表》，提交董事会审批考核结项。 4) If the reported situation involves a crime, the "Application Form for Case Filing" shall be filled out, and submitted to the Board and the Chairman of the Group to decide whether to transfer it to the judiciary in a timely manner. /举报情况涉及违法犯罪的，应填写《立案申请书》，及时请示董事会和集团董事长决策是否移交司法机关处理。				
7	Communication /沟通	After the investigation is completed, the Board nominated personnel shall report the relevant situation to the Board, issue a Supervision Report (Communication), confirm the dealing opinions with the corresponding department leaders in a timely manner, and strictly follow the "Sany Group Accountability Management Policy" to perform the accountability to relevant responsible persons. Employees below L18 (inclusive) involved in serious violations and frauds that need to be dealt with shall be confirmed with the head of the corresponding department, employees of L19 to L21 involved in serious violations and frauds that need to be dealt with shall be confirmed with the MD or its authorized person, employees of L22 and above involved in serious violations and frauds that need to be	Board nominated personnel / 董 事会任命人 员	Supervision Report (Communication) /监察报告（沟通 稿）	Supervision Report (Confirm) / 监 察报告（确认稿）	

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		dealt with shall be reported to the Chairman of the Group. /调查完成后, 董事会任命人员应向董事会汇报相关情况, 出具《监察报告》(沟通稿), 与相应部门领导及时确认处理意见, 严格按照《三一集团问责管理制度》对相关责任人进行问责。18级(含)以下员工涉及严重违规、舞弊需进行处理的, 应与相应部门的部门经理确认; 19级-21级干部涉及严重违规、舞弊需进行处理的, 应与董事总经理或授权人确认; 22级(含)以上干部涉及严重违规、舞弊需进行处理的, 向集团董事长报告。				
8	Issue Supervision Report / 出具 监察报告	According to the communication opinions, the Board nominated personnel forms a Supervision Report (Final), which shall be reviewed by the Board and forwarded to the supervised individual for execution. / 根据沟通意见, 董事会任命人员最终形成《监察报告》, 由董事会审核, 并转被监察个人执行。	Board nominated personnel / 董 事会任命人 员	Supervision Report (Confirm) / 监 察 报告(确认稿)	Supervision Report (Final) / 监 察 报告 (正式稿)	
9	Rectification, Accountability, Feedback / 整 改、问责、反 馈	1) The relevant business departments involved in the investigation report shall, after receiving dealing opinions, implement in a timely manner, complete rectification, perform accountability in accordance with the "Accountability Management Policy", and provide written feedback to the Board nominated personnel within 7 working days. /调查报告涉及的相关业务部门在收到相关处理意见后, 应及时落实处理, 完成整改, 根据《问责管理规定》进行问责, 并在7个工作日内向审计监察总部进行书面反馈。 2) Those who fail to carry out rectification and accountability as required shall be dealt with in strict accordance with the "Sany Group Accountability Management Policy". /未按要求进行整改、问责的, 严格按照《三一集团问责管理制度》问责处理。	BU & Dept. / 相关业务部 门	Supervision Report (Final) / 监 察 报告 (正式稿)	The rectification of the Supervision Report / 监 察 报告 整改情况	
10	Follow-up, Confirm, Summarize / 跟 踪、确认、总 结	1) The Board nominated personnel follows up and confirms the rectification of relevant business departments and the implementation of problems to ensure that the company's operational risks and hidden dangers are eliminated. / 董事会任命人员对相关业务部门的整改、问题落实情况进行跟踪、确认, 确保消除公司运营风险及隐患。 2) The Board nominated personnel analyzes and summarizes the experience, results, and deficiencies in the investigation and dealing of reported cases. / 董事会任命人员对举报案件调查处理的经验、成果、不足等进行分析、总结。	Board nominated personnel / 董 事会任命人 员	The rectification of the Supervision Report / 监 察 报告 整改情况	All the materials of the Supervision Report / 监 察 报告 所有资料	
11	Closing, Assessments / 结 案登记、考核	1) The RAS completes the registration of the reported cases that have been closed, and enter the relevant case experience into	RAS / 举报受 理专员	All the materials of the Supervision	File of the Reporting / 举 报 档案	

序号 SN	活动 Act.	规则 Rules	角色 Role	输入 Input	输出 Output	文件 Docu.
		the register. /举报受理专员对已办理完毕举报案件进行结案登记，将相关案件经验等录入登记簿。 2) The RAS is responsible for giving feedback to the PR on the results within 1 working day after the report is closed. /举报受理专员负责在举报完成后1个工作日内向举报人反馈处理结果。 3) The RAS is responsible for unified and centralized management of the reporting files. According to the Supervision Report number and chronological order, the reporting materials and drafts are separately archived and managed, and bound into a book. The RAS must strictly abide by the discipline of confidentiality and maintain the integrity and security of the files. /举报受理专员负责对举报档案统一集中管理，按照监察报告号以及时间顺序，单独归档管理举报资料及底稿，并装订成册。举报受理专员需严格遵守保密纪律，维护档案的完整与安全。 4) The archived documents and materials must be the originals in principle, and no individual shall retain the originals and copies without authorization. /归档的文件资料，原则上必须是原件，任何个人不得擅自留存原件及复印件。 5) No one is allowed to provide or disseminate archival materials without authorization. No one is allowed to consult the files without authorization. If someone needs to consult the files, it must be approved by MD and must be in the designated place of the office, and no photos or take the files out. No one is allowed to extract, photocopying, taking photos, or lending the reporting files. If someone needs to copy or lend files, it must be approved by the MD. The time for lending files should not exceed one week. If a leak is found, the leaker will be held accountable. /任何人不得擅自向外提供、传播档案材料；任何人不得擅自查阅档案，如需查阅档案，必须经董事总经理批准；查阅必须在办公室指定的地方，不得拍照或携带外出；任何人不得摘抄、复印、拍照、借出举报档案，如需复印或借出档案，必须经董事总经理批准，借出档案时间不得超过一周；发现泄密事件，追究泄密者责任。 6) The Board conducts assessments on the quality, efficiency, and implementation of rectifications and reforms in accordance with uniform standards. / 董事会按照统一的标准.对举报调查事项的完成质量、效率、整改落实情况等 进行考核		Report /监察报告 所有资料		

12. Annex / 附件

12.1 Annex 1: Reporting Channels / 附件 1: 举报渠道

- E-mail: cs@sanygroup.com
- Tel: +91 2135670288
- Plot no. E-4, Chakan Industrial Area Phase III, Taluka Khed, Pune 410501 Maharashtra India

12.2 Annex 2: Report Processing Sequence / 附件 2: 举报处理顺序表

A	Real name reports with obvious violations and clear evidence / 实名举报、存在明显违规事实且有明确证据的举报
B	Anonymous reports with certain violations and evidence, or reports with positive responses after contact / 匿名举报，但存在一定违规事实且有一定证据的举报、或联系后有积极回复的举报
C	Anonymous reports without obvious violation facts, or reports without reply after contact / 匿名举报，无明显违规事实的举报、或联系后无回复的举报
D	Complaints, or coordination issues, or the object is unknown, or the content is empty / 抱怨、协调事项、举报对象不明、举报内容空洞