

## Shivalik Bimetal Controls Limited

### Policy on Restriction of AI Platforms & Personal Data Protection

#### 1. OBJECTIVE

**Shivalik Bimetal Controls Limited (SBCL)** recognizes the importance of protecting sensitive corporate, customer, and employee information. This policy is intended to ensure that confidential or personal information belonging to the Company, its partners, customers or vendors is not shared with, processed by, or exposed through external AI systems or networks without authorization. It is designed to reduce data security risks and support strong standards of information protection and compliance.

#### 2. PURPOSE

Publicly accessible Artificial Intelligence (AI) platforms typically process and retain user prompts, interaction history, and uploaded content to enhance and train their underlying machine learning models. The inadvertent or intentional sharing of confidential, personal, or proprietary information on such platforms poses a significant risk. It may result in data exposure, leading to legal liabilities, regulatory non-compliance, financial penalties, and reputational damage.

#### 3. DEFINITION OF RESTRICTED PERSONAL DATA

Under this policy, "Personal Data" includes but not limited to any information that can directly or indirectly identify an individual. "Confidential Data" includes but not limited to as any sensitive information shared with Shivalik by any customer, vendor or supplier, in any format.

SBCL employees must not enter the following categories of data into unauthorized AI tools:

- **Customer and Vendor Identifiers:** Names, phone numbers, personal email addresses, geographic locations, Customer specifications, any drawings, 2D and 3D files, biometric or demographic details and full or selective text from emails (internal or external).
- **National Identifiers:** Aadhaar numbers, Permanent Account Numbers (PAN), Passport data, or driver's licenses.
- **Financial Information:** Bank account numbers, credit/debit card tracking data, salary structures, or tax invoices.
- **Employment and HR Records:** Candidate resumes, employee performance records, medical reports, and internal grievance records.

#### 4. AI PLATFORM USAGE CLASSIFICATION

Platform type	Examples & scope	Data transmission mandate
Prohibited	<b>Public AI Web Tools:</b> Free or Paid (premium) tiers of AI tools such as ChatGPT, Claude, DeepSeek, open-web translation tools, and public grammar checkers.	<b>No Data Sharing.</b> Do not enter any text, code, or attachments into these platforms. Access may be blocked on the corporate VPN.

Restricted	<b>Enterprise AI Platforms:</b> Premium subscriptions with contract-backed privacy clauses.	Permitted for general business use. Processing of raw or non-anonymized customer personal data is not permitted.
Approved	<b>Sanitized / Internal Platforms:</b> On-premises instances or enterprise AI tools configured with zero data retention APIs.	Permitted for operational execution. Data must be anonymized or aggregated where feasible.

## 5. TECHNICAL ENFORCEMENT & COMPLIANCE MONITORING

SBCL enforces this policy through the following technical controls:

**Endpoint Data Loss Prevention (DLP):** Security software on company laptops may block the copying and pasting of text that matches patterns associated with personal data into external web browsers.

**Web Filtering and Monitoring:** Network-level controls may restrict access to public AI platforms. Attempts to bypass these controls through unauthorized means, including proxies or personal hotspots while using corporate assets, may result in a security alert and further review.

## 6. VIOLATIONS & ACCOUNTABILITIES

Any employee who uploads unredacted personal data to a prohibited AI tool may be subject to review under the Company's information security incident management process. Confirmed violations may result in disciplinary action, up to and including termination of employment or contract, and referral for legal review under applicable law, including the Digital Personal Data Protection (DPDP) framework where relevant.

## 7. COMMUNICATION

SBCL shall implement appropriate measures and controls to address risks associated with the use of Artificial Intelligence, including ethical, legal, and data-related concerns. Accordingly, SBCL will provide suitable awareness to its employees on responsible AI usage, applicable laws, and their roles and responsibilities, to ensure compliance with regulatory requirements and adherence to established standards.

## 8. POLICY REVIEW

SBCL shall review the policy as and when any changes are to be incorporated in the policy due to change in applicable law.

Note: This policy was adopted by the Board of Directors of the Company at its meeting held on May 18th, 2026.