

Whistle Blower Policy / Vigil Mechanism

[as per Sub Section (9) and (10) of Section 177 of Companies Act, 2013 read with rule 7 (of Companies Meeting of Board and its Powers) Rules, 2014]

Our Company believes in the affairs of its constituents in a fair and transparent manner by adopting highest standard of professionalism, honesty, integrity and ethical behaviour. For ensuring better efficiency and transparency, the Company has adopted the following mechanism as its Policy.

Many a violation does not affect an individual directly, but is detrimental to the organisation's interest. Individuals hesitate to report such violations out of fear or indifference. This mechanism would help such an individual to report violations with no fear of victimisation. Eg: When any employee sees violations of integrity norms, he may not be directly aggrieved, but may have information that organisational interests are being compromised. This may be unethical behaviour, suspected or actual fraud, violation of the Code of Conduct etc. Before reporting such events, the employee should to the extent possible, ascertain that a violation has actually occurred and that act is not based on what can be termed as a normal business decision.

In all such cases, the employee will address the complaint to any member of the Enforcement Committee along with the available details and evidence to the extent possible.

As a rule:

1. anonymous complaint will not be entertained
2. identity of the complainant will be protected and will be known only to the Enforcement committee
3. no unfair treatment will be meted to the whistle blower by virtue of his/her having reported a Protected Disclosure under this policy
4. The Company as a policy condemns any kind of discrimination, harassment, victimisation or any other unfair employment practice being adopted against Whistle Blower.

The Enforcement Committee may meet the complainant, if necessary. They may also appoint any suitable person or group of persons to investigate the case, but will ensure that the identity of the complainant is protected. The Enforcement Committee will decide the case and recommend action within four weeks to the Chairman & Managing Director. The final action to be taken will be decided by the Chairman & Managing Director.

The analysis of the case and action to be taken may not be communicated to the original complainant. The Director in all cases and employee in appropriate or exceptional cases will have direct access with the Chairman of the Audit Committee.

Enforcement Committee consist of:

- a) Mr. Atul Maheshwari
- b) Mrs. Sangita Maheshwari
- c) Mr. Ashish Bhatia

Mr. Atul Maheshwari will be the Chairman of the Enforcement Committee.

Any grievance against any member of the Enforcement Committee should be addressed to the Chairman & Managing Director.