



## WHISTLE BLOWER POLICY SEC 177(10)

Section 177 of the Companies Act, 2013 requires every listed company to establish a vigil mechanism for the directors and employees to report genuine concerns in such manner as may be prescribed. The Company) had adopted a Code of Conduct for Directors and Senior Management Executives (“the Code”), which lays down the principles and standards that should govern their actions. Any actual or potential violation of the Code is a matter of serious concern for the Company and should be brought to the attention of the concerned.

Clause 49 of the Listing Agreement between the company and the Bombay Stock Exchange, inter alia, provides for a non-mandatory requirement to establish a mechanism called ‘Whistle Blower Policy’ for employees to report to the management instances of unethical behavior , actual or suspected, fraud or violation of the company’s code of conduct.

The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

A Vigil (Whistle Blower) mechanism provides a channel to the employees and Directors to report to the management concerns about unethical behavior, actual or suspected fraud or violation of the Codes of conduct or policy. The mechanism provides for adequate safeguards against victimization of employees and Directors to avail of the mechanism and also provide for direct access to the Chairman/ Managing Director/ Chairman of the Audit Committee in exceptional cases.

## **THE GUIDING PRINCIPLES**

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will -

- Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for

Doing so;

- Treat victimization as a serious matter including initiating disciplinary action on such person/(s);

- Ensure complete confidentiality.

- Not attempt to conceal evidence of the Protected Disclosure;

- Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be

made;

- Provide an opportunity of being heard to the persons involved especially to the Subject;