

## SUMMARY OF VIGIL MECHANISM/ WHISTLE BLOWER POLICY

In Compliance with the provisions of section 177(9) & (10) of the Companies Act, 2013 and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the Company has adopted Vigil Mechanism / Whistle Blower Policy.

Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company. The role of employees in pointing out such violation of the Code cannot be undermined. Accordingly, this whistle blower policy/ vigil mechanism has been formulated with a view to provide a mechanism for employees of the Company to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

Following is a summary, highlighting the features of the Whistle Blower Policy

1. Under the Whistle Blower Policy ('the Policy'), Employees and Directors of the Company can report genuine concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct & Ethics, without fear of punishment for such disclosure or unfair treatment.
2. To facilitate an independent and unbiased investigation, the Company has designated the Internal Auditors (M/s Gupta Raj & Co., an Independent firm of Chartered Accountants) to receive and process complaints received under this Policy and in turn to report to the Chairman of the Audit Committee, who will place the same before the Audit Committee for its consideration and recommendations to the Management. A dedicated email id has been designated for this purpose and communicated to the employees.
3. The Policy covers all malpractices and all unethical, illegal or improper activities including but not limited to the following matters:
  - i. Abuse of authority
  - ii. Negligence causing substantial and specific danger to public health and safety
  - iii. Deliberate violation of laws/regulations
  - iv. Financial irregularities including fraud or suspected fraud
  - v. Criminal offence
  - vi. Breach of terms and conditions of employment and rules thereof
  - vii. Pilferation of confidential / proprietary information
  - viii. Gross Wastage/misappropriation of Company funds/assets
  - ix. Breach of Code of Conduct & Ethics Policy
  - x. To provide protection against Sexual Harassment of women at workplace
  - xi. Any other unethical or immoral or illegal events
4. The Policy provides for protection of whistle blowers against unfair treatment.

5. Investigations shall be carried out in an unbiased manner.
6. The Policy contains provisions for disciplinary action against malafide or malicious complaints.

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