

## **POLICY ON WHISTLE BLOWER & VIGIL MECHANISM**

If the employee believes that they have violated the Code of Conduct, then they may report the violation to the company so that appropriate action can be taken. While taking disciplinary action, the company will take into consideration that the employee has voluntarily reported their breach of code of conduct.

If the employee becomes aware that another employee has, in all likelihood, violated the code, including any law or regulation applicable to the company's business, then it is their duty to report that violation to the whistle blower committee, so that the company can take necessary steps to rectify the problem and prevent a recurrence. The identity of the person or persons making a report will remain confidential except on a "need to know" basis.

### **Whistle Blower Committee**

In accordance with sub-section (9) of Section 177 read with Section Rule 7(2) of the Companies (Meetings of Board and its Powers) Rules, 2014, the Company's Audit Committee is required to oversee the vigil mechanism.

Accordingly, the Audit Committee constituted by the Board of Directors in accordance with Section 177 of the Companies Act, 2013 read with Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be construed as the 'Whistle Blower Committee'.

A Vigil 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 both the whistle-blower and also the accused under a whistle-blower event and to avail of the mechanism and also provide for direct and discreet access to the Vigilance Officer and further escalation to Chairperson of the Audit Committee in exceptional cases.

This policy, however, neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations against people in authority and / or colleagues in general.

### **False Complaints:**

While this policy is intended to bring out misconduct happening in Company and also to protect genuine whistleblowers from any unfair treatment, however any persons or group of persons who made complaints with mala fide intentions and which is finally found to be false will be subject to strict disciplinary / legal action.