

PODDAR PIGMENTS LIMITED

REGD. OFFICE : E-10-11 & F-14 TO 16, RIICO INDUSTRIAL AREA, SITAPURA, JAIPUR (RAJASTHAN) - 302022
CIN: L24117RJ1991PLC006307, TEL. NO: 0141-2770202/ 03, FAX NO. : 0141-2771922
E-mail address: jaipur@poddarpigmentsltd.com , Website address:www.poddarpigmentsltd.com

WHISTLE BLOWER POLICY

1. Objective

This policy is formulated to provide mechanism to employees & Directors to approach the Audit Committee of the Company and disclose unethical and improper practices or any other alleged wrongful conduct in the Company.

The Board of Director has approved the policy on 15.05.2014 and the Board of Directors has approved the updated Whistle Blower Policy of the Company in their meeting held on 24th May, 2019.

2. Applicability

This policy applies to all employees & Directors of the Company.

3. Scope of Policy

The policy intends to cover information in connection with suspected unethical and / or improper practices or wrongful conduct and / or deeds , which employee(s) and directors in good faith believes to exist such as:

- a. Manipulation of Company data / records
- b. A substantial and specific danger to public health safety.
- c. An abuse of authority
- d. Leaking confidential or proprietary information including reporting instances of leak of UPSI or suspected leak of UPSI and appropriate actions to be taken in this regard.
- e. Violation of any law or regulations
- f. Gross wastage or misappropriation of company funds/assets
- g. Activities violating policies of the Company including Code of Conduct
- h. Fraudulent representation before the purchaser / suppliers

The above list is only illustrative.

4. Procedures

- a. The Audit Committee will supervise the implementation of this policy including receipt of disclosures and investigation of matters.
- b. Any employee and director who observes any unethical and / or improper practices or alleged wrongful conduct shall make a disclosure to the Audit Committee in writing as soon as possible but not later than 60-days after becoming aware of the same and shall furnish available details and evidence as possible.
- c. The Audit Committee shall appropriately and expeditiously investigate all whistle blower reports received.
- d. The Audit Committee shall have right to call for any information / document and examination of any employee and director of the Company or other persons (s) as they may deem appropriate for the purpose of conducting Investigation under this policy.

- e. After completion of investigation, the Audit Committee shall determine the cause of action and may order for remedies which may inter alia include-
 - i) Revision of the policies and procedures of the Company to reduce the risk of recurrence.
 - ii) Suggest action against concerned persons.

5. **Anonymous Allegations**

This policy requires individuals to put their name to any disclosures they make.

6. **Confidentiality**

The Company will treat all such disclosures in a sensitive manner and will endeavour to keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.

7. **Untrue / Malicious / Vexations Allegations.**

If an individual makes an allegation, which is not confirmed by subsequent events, and the investigation shows that an individual has made malicious or vexatious allegations for personal leverage, and particularly if he or she persists with making them, disciplinary action may be taken against the individual concerned.

8. **Notification**

All departmental heads are required to notify and communicate the existence and contents of this policy to the employees of their department. The new employees shall be informed about the policy by the Personnel & Administration department and Director shall be informed about the policy by the Secretarial Deptt.

This policy as amended from time to time shall be made available on the Website of the Company.

9. The contact details of the Chairman of the Audit Committee is as follows:-

a.	The Chairman, Audit Committee, Poddar Pigments Ltd., E-10-11, F-14 to 16, RIICO Industrial Area, Sitapura, Jaipur – 302 022	Email id: lkumaramangalam@gmail.com
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10. **Protection for the Complainant:-**

- (a) No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this policy. Adequate safeguards against victimization of complainants shall be provided.
- (b) The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure.
- (c) The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.
