



WHISTLE BLOWER POLICY/VIGIL MECHANISM OF THE COMPANY

Our Whistle Blower Policy encourages disclosure in good faith of any wrongful conduct on a matter of general concern and protects the whistle blower from any adverse personnel action.

1. PREFACE AND OBJECTIVES:-

“Sehaj Synergy Technologies Private Limited” (“Company”) believes in the policy of ethical and lawful business conduct and as a part of this policy strives to carry on its business activities in fair, transparent and professional manner. The Company has continuously strived for developing an environment which would be safe for its employees. The Company has adopted a Code of Conduct for Directors and Senior Management Executives (“Code”), which lays down the principles and standards that should govern the actions of the Company and its employees. Any actual or potential violation of the code, howsoever insignificant or perceived as such, would be a matter of serious concerns for the Company. Vigil mechanism shall provide for adequate safeguards against victimization of persons who use such mechanism and also make provisions for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases.

- i. The “Whistle Blower Policy”/ “Vigil Mechanism” is formulated for securing/reporting/deterring/punishing/rectifying any unethical, unlawful acts, behavior etc. and to enable to voice/address bonafide concern of malpractice, deviation from the policies of the Company internally in an effective and systematic manner after its discovery.
- ii. The employees of the Company have a basic responsibility to make the management aware of any non adherence of the mechanism.

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- iii. This mechanism is in accordance with the requirements of Section 177 of the Companies Act, 2013 and the rules made there under. Any future amendments to the said Act/rules will necessitate amendments of this policy to be in tandem with the prevailing statute.

SCOPE OF THE POLICY

The policy covers malpractices and events which have taken place/suspected to have taken place, is being taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company's rules and policies, manipulations, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of which the interest of the Company is affected and to report the same in accordance with the policy.

2. DEFINITIONS

The definitions of some of the key terms used in the policy are given below.

Capitalized terms not defined herein shall have the meaning assigned to them under the Code.

- a) "**Audit Committee**" means the Audit Committee of Directors constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013.
- b) "**Employees**" means every employee of the Company including the directors in the employment of the Company.
- c) "**Code**" means the code of "Sehaj Synergy Technologies Private Limited".
- d) "**Director**" means every Director of the Company, past or present.





- e) **“Designated officer”** means Chairman of the Audit Committee or such other officer of the Company who shall be expressly designated for the purpose of this mechanism.
- f) **“Disciplinary Action”** means warning, imposition of fine, suspension from official duties or such other action that may be decided by the Audit Committee depending on the gravity of the matter.
- g) **“Disclosure”** means reporting of malpractice done by an Individual under and as per the mechanism.
- h) **“Individual”** means the person who makes disclosure under this mechanism.
- i) **“Wrongdoer”** means person against whom disclosure of malpractice is made by an Individual.
- j) **“Whistle Blower”** is an employee or group of employees who makes a Protected Disclosure under the Policy.

3. ELIGIBILITY

Employees of the Company are eligible to make Protected Disclosures under the Policy in relation to matters relating to alleged wrongful conduct.

4. APPLICABILITY

This mechanism shall, in relation to the Company, apply to all the:

- i. Directors,
- ii. Employees,
- iii. Trainees,
- iv. Any other persons as may be decided by the Board of Directors of the Company.

5. COVERAGE

The following activities, events may be brought to the notice of the designated officer:

- i. Violation of Code of Conduct of the Company.
- ii. Unethical, immoral, biased conduct or behavior.





- iii. Abuse of the power or the authority given.
- iv. Breach of contract.
- v. Tampering or manipulating any record and data of the Company.
- vi. Any activity, malpractice or wrongdoing which may be harmful for the persons working in or for the Company or for the Company's image.
- vii. Financial irregularities and any type of fraud.
- viii. Misappropriation of the Company's funds.
- ix. Any activity which is criminal and illegal in nature.
- x. Negligence, lapse causing harm to environment or health, safety of the employees of the Company or public.
- xi. Concealment of above activities.
- xii. Such other issues as may be prescribed by the Audit Committee.

6. PROCEDURE TO BE FOLLOWED UNDER THIS MECHANISM

1) Disclosure:

Any person may disclose, preferably in writing the following:

- I. Brief details of the malpractice found or discovered,
- II. Name of the alleged wrongdoer,
- III. Evidence, if any, to support the allegation,
- IV. Remedial actions required to be taken,
- V. Any other relevant details.

The disclosure may be made within 30 days of being aware of the event to the designated officer of the Company. The time limit of 30 days may be extended at the discretion of the designated officer, after considering the circumstances.

The personal making the said disclosure may disclose his / her identity to the designated officer. The identity of the person reporting the malpractice will be kept confidential if the same is provided with a condition to keep it anonymous.

Note: In exceptional cases, the person making the disclosure can have direct access to the Chairperson of the Audit Committee of the Company.


