



## WHISTLE BLOWER POLICY AND VIGIL MECHANISM

### **1. Background & Objective:**

The provisions of Section 177 of the Companies Act, 2013, read with the Companies (Meetings of Board and its Powers) Rules, 2014 and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 mandate every listed company or such class or classes of companies as prescribed to establish a vigil mechanism for directors and employees to report genuine concern or grievances.

The Company is committed to ensure compliance of all the applicable laws and policies and procedures framed by it from time to time, by the Directors and employees of the Company. Purpose of this policy is to provide a framework through which all the Directors and employees report their genuine concerns and actual / potential violations to the designated officials of the Company fearlessly, as provided in Section 177 of the Companies Act, 2013 and Rules made thereunder, Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 as amended from time to time, and other applicable laws.

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

### **2. Objective:**

SVLL believes in policy of ethical and lawful business conduct and as a part of this policy strives to carry on its business activities in a fair, transparent and professional manner. The Company has continuously strived for developing an environment which would be safe for its employees. Vigil Mechanism shall provide for adequate safeguard against victimization of persons who use such mechanism and also make provisions for direct access to the Chairperson of the Audit Committee in appropriate and exceptional cases.

- A) With a view to extract maximum information on activities affecting the Company, its values, philosophy, principles and beliefs including violations of legal or regulatory requirements, incorrect or misrepresentation of financial statements, reports etc., it is proposed to bring into effect detection and prevention of any act or otherwise indulged by any employee, which is detrimental and/or jeopardizing our organizational value systems, across SVLL.
- B) To provide appropriate avenues to the Stakeholders to bring to the attention of the management or express any issue/potential concern which is perceived to be in



violation or in conflict with the corporate values and business principles, the Vigil Mechanism is being instituted.

C) This mechanism is in accordance to Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Section 177 of the Companies Act, 2013 and Rules made there under.

### **3. Who can report:**

Any whistle-blower among the Directors and employees of the Company can report genuine concerns and actual or potential violations.

### **4. Concerns / violations that can be reported:**

- i. Violation of Code of Conduct of the Company.
- ii. Unethical, immoral, biased conduct or behaviour.
- iii. Abuse of the power or authority given.
- iv. Breach of contract.
- v. Tampering or manipulating any data and records 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 issue as may be prescribed by the Audit Committee.

### **5. Lodging of Complaints:**

Complaints on the matters listed at paragraph 4 above, including anonymous, can be directly reported/ lodged with the following designated official:

Designation:	Company Secretary
Address:	Logistics Park, Opp. Jaika automobiles, Ring Road No. 1, Raipur-492001, C.G.
Phone:	7000681501
E-mail ID:	surabhi@shreevasulogistics.com

Alternatively, complaints can also be sent to the Chairman of the Audit Committee at his e-mail id at [kulmonty@gmail.com](mailto:kulmonty@gmail.com).



Whistle Blower must put his/her name to lodge a complaint as follow-up questions and investigation may not be possible unless the source of the information is identified. Disclosures expressed anonymously will ordinarily not be investigated.

To the extent possible, the complaint or disclosure must include the following:

- a) The Director(s) / employee(s) and/or outside party or parties involved;
- b) The sector of the Company where it happened (division, office, department);
- c) When did it happen: a date or a period of time;
- d) Type of concern (what happened);
- e) Submit proof or identify where proof can be found, if possible;
- f) Who to contact for more information, if possible;
- g) Prior efforts to address the problem, if any.

#### **6. Investigation Procedure:**

- i. The complaints may be made within 30 days of being aware of the event to the designated official of the Company. The time limit of 30 days may be extended at the discretion of the designated official, after considering the circumstances.
- ii. All the complaints received by the designated official as above shall be logged and thereafter shall be forwarded to the Audit Committee.
- iii. The Audit Committee shall investigate and hear the parties, as may be needed, after due notice.
- iv. The Audit Committee shall determine the appropriate actions on the complaint based on the investigation carried out by the Committee.
- v. In case, any member of the Audit Committee has conflict of interest in any complaint, the remaining members of the Audit Committee shall deal with the matter.

#### **7. Protection and Safeguards:**

The Audit Committee shall ensure

- a) protection of complainant/ witness, if any, against any harassment and victimization
- b) protection of the complainant identity



**8. Frivolous Complaints:**

Audit Committee shall take suitable action against the complainant for any frivolous complaint.

**9. Miscellaneous:**

- a) All the relevant documents namely complaint or the gist of oral complaint, as the case may be, information/ document obtained during the investigation as evidence, including from witness, if any shall be fully secured to avoid any tampering and shall be preserved for a period of 2 years from the date of the closure report or the investigation report, as the case may be.
- b) In exceptional cases as may be decided by the Company Secretary after considering the facts of such cases, the whistle blower / complainant shall be provided direct access to the Chairman of the Audit Committee.

**10. Amendment(s) in the Policy :**

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant government authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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