



## ***Whistle Blower Policy (Vigil Mechanism)***

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### **Objective**

The Company is committed to provide the good standard of ethical, moral and legal conduct related to the business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. A Vigil (Whistle Blower) mechanism provides a channel to the employees and Directors to report to the management concerns about unethical behaviour, actual or suspected fraud or violation of the Codes of conduct or legal or regulatory requirements incorrect or misrepresentation of any financial statements and reports, etc.

### **Applicability**

This policy applies to all stakeholders including employees and Directors of the Company and its subsidiary companies.

### **Scope of Policy**

The policy is an extension of the Code of Conduct for Directors & Senior Management Personnel and covers disclosure of an unethical malpractices and events which have suspected to take place involving:

- Breach of Company's Code of Conduct
- Breach of Business Ethics
- Breach of terms and conditions of employment
- Deliberate violations of law
- Manipulation of Company's data and records
- Wastage or misappropriation of Company's asset.

The above list is only illustrative and should not be considered as exhaustive.

### **Procedures**

The Company has Audit Committee for monitoring of the Whistle Blower / Vigil Mechanism which has been entrusted with various functions under this Policy including receipt of disclosures and investigation of matters. Any complainant who observes any unethical and improper practices or alleged wrongful conduct shall make a complaint to Audit Committee in writing as soon as possible but not later than 45 consecutive calendar days after becoming aware of the same and shall furnish as much details and evidence as possible.

The Committee shall appropriately and expeditiously investigate all reports received and as right to call for any information / document and examination of any employee of the Company or other person(s) as they may deem appropriate for the purpose of conducting investigation under this policy.



After completion of investigation, a report shall be prepared and considered. After considering the report, 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 reoccurrence
- ii. Suggest action against concerned persons

#### **Protection**

No discrimination, harassment, victimization or any other unfair employment practice like retaliation, threat or intimidation of termination /suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like will be adopted against Whistle Blowers.

A Whistle Blower report any violation of the above clause to the Chairman of the Audit Committee, who shall investigate into the same and recommend suitable action to the management which may inter alia include

- i. Reinstatement of the employee to the same position or to an equivalent position
- ii. Order for compensation for lost wages, remuneration or any other benefits, etc.

#### **Confidentiality**

The Company will treat all such disclosures in a sensitive manner and will 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.

#### **Untrue / Malicious Allegations**

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

#### **Legitimate Employment Action**

This policy may not be used as a defense by the Complainant against whom an adverse personnel action has been taken for legitimate reasons or cause under Company rules and policies. It shall not be a violation of this policy to take adverse personnel action against the Complainant whose conduct or performance warrants that action separate and apart from that Complainant making a disclosure.

#### **Anonymous complaints**

In order to discourage and frivolous and baseless allegations and misuse of this policy, the whistle blower committee does not take cognizance of anonymous letters. However, the contents of even the anonymous letters will be taken note of by both the members of the Committee, if the allegations are substantiated by facts. and after due deliberations the Committee members will decide whether to examine the issues raised by the anonymous complainants.



## 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 HR department and statement in this regard should be periodically submitted to the Compliance Officer of the Company i.e. the Company Secretary for placing before the Audit Committee.

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

The Details of the Audit Committee are :

a	<b>Chairman of the Audit committee Mr. Ajay Kumar Khandelwal</b>	ajaykhandelwal.2018@gmail.com
b	<b>Contact Address</b>	1/A Fakir Dey Lane, Bowbazar, 1st Floor, Kolkata-700 012

## Note :

This Policy was adopted by the Audit Committee of the Board of Anubhav Infrastructure Limited at its meeting held on December 01, 2022 and also appropriately amended subsequently by the Board of Directors of the Company at its meeting held on December 30, 2022. The Policy is reviewed and updated by the Audit Committee periodically.