



Whistleblower Policy

- **Policy Detail:**

1. The policy is for the permanent employees of Rajgreen Group of companies.
2. The Policy has been drawn up so that the Employees can be confident about raising a concern.
3. The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects employees wishing to raise a concern about serious irregularities within the Company.
4. The policy neither releases employees of their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

- **Objectives:**

The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of 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.

- **Definition:**

The definitions of some of the key terms used in this Policy are given below;

1. "Code "means Rajgreen Code of Conduct.
2. "Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
3. "Investigators" means those person who are authorized, appointed, consulted or approached by the Management or audit committee. And it includes company employee and the police.
4. "Subject" means a person against or in relation to whom a protected disclosure under this policy.



- **Scope:**

1. The Whistle Blower's role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.
2. Whistle Blowers should not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the management.
3. Protected Disclosure will be appropriately dealt with by the management/ Audit Committee, as the case may be.

- **Eligibility:**

All Employees of the Company are eligible to make Protected Disclosures under the Policy. The Protected Disclosures may be in relation to matters concerning the Company.

- **Non Eligibility:**

1. While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
2. Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention (with intent to deceive).
3. Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious shall be liable to be prosecuted under Company's Code of Conduct.

- **Coverage of Policy:**

The Policy covers malpractices and events which have taken place/ suspected to take place involving:

1. Abuse of authority
2. Breach of contract



3. Negligence causing substantial and specific danger to public health and safety
4. Manipulation of company data/records
5. Financial irregularities, including fraud, or suspected fraud
6. Criminal offence
7. Misuse of confidential/propriety information
8. Deliberate violation of law/regulation
9. Wastage/misappropriation of company funds/assets
10. Breach of employee Code of Conduct/Ethics Policy or Rules
11. Any other unethical, biased, favoured, imprudent event

• **Procedures:**

1. All Protected Disclosures concerning financial/accounting matters should be addressed to the Audit Committee of the Company for investigation.
2. In respect of all other Protected Disclosures, those concerning by employees at the levels of Vice Presidents and above should be addressed to the Audit Committee of the Company and those concerning other employees should be addressed to the Vice President of the Company.
3. The contact details of the Chairman of the Audit Committee are as under:

Sr.no	Name	Email ID
1	Ms.Rutu Movaliya	rutu@rajgreen.co.in
2	Mr.Prasanna Gargava	prasanna@rajgreen.co.in
3	Mr. Rakesh Kumar	rakesh@rajgreen.co.in
4	Mr.Bhaumik Trivedi	bhaumik.t@amaazia.co.in
5	Mr. Hardik Vaidya	hardik@rajhansplex.com

4. If a protected disclosure is received by any executive of the Company other than Audit Committee, the same should be forwarded to the Company's Audit Committee for further appropriate action. Appropriate care must be taken to keep the identity of the Whistle Blower confidential.
5. Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower. Oral reports will normally be documented by the Audit Committee accessing the voice mail by a written transcription of the oral report.



6. The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the Whistle Blower. The Audit Committee, as the case may be shall detach the covering letter and forward only the Protected Disclosure to the Investigators for investigation.
7. Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.
8. For the purpose of providing protection to the Whistle Blower, the Whistle Blower should disclose his/her identity in the covering letter forwarding such Protected Disclosure.

- **Protection:**

1. No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. Whistle Blower Policy protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure, etc.
2. Whistle Blower may 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.
3. The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law.
4. Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.



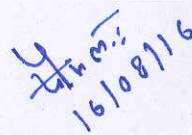
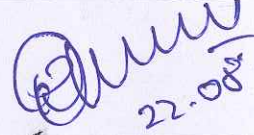


• **Confidentiality:**

The Whistle Blower, the Subject, and every one involved in the process shall:

1. Maintain complete confidentiality/ secrecy of the matter
2. Not discuss the matter in any informal/social gatherings/ meetings
3. Discuss only to the extent or with the persons required for the purpose of completing the process and investigations
4. Not keep the papers unattended anywhere at any time
5. Keep the electronic mails/files under password

If any one is found not complying with the above, he/ she shall be held liable for such disciplinary action as is considered fit.

Prepared by	Reviewed & Recommended by	Approved by
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 12/8/16	 12/8/16  16/08/16	 22.08.16