

VIGIL MECHANISM POLICY

PREM CABLES PVT LTD

1. PREFACE

Prem Cables Pvt Ltd ('the Company') strongly believes that unethical and concerns should be reported and hence the Company shall establish a vigil mechanism / whistle blower policy, ("the Policy"), for the directors and employees (including third party vendors and partners) to report genuine concerns and incidents of unethical behaviour, which are actual or suspected, fraud or violation of policies of the Company to the management. The Policy shall provide for adequate safeguards against victimization of persons who use such mechanism and also make provision for direct access to the Managing Director in appropriate or exceptional cases.

2. PURPOSE

Prem Cables Pvt Ltd is a family driven Company and strongly believes in strong ethical values. The Company through this policy encourages its employees to raise concerns and incidents, so that proper actions can be taken and this can curb unethical instances to occur in future. The Company also wishes to inform that the employees do not need to fear of any unfair treatment, in case a incident is reported, provided the incident is genuine and is not raised with the intent to misguide the management or hurt the reputation of any fellow employee.

This neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations against people in authority and / or colleagues in general.

3. COVERAGE

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company rules, 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 formally reported by whistle blowers concerning its employees.

In accordance with the Companies Act, 2013 Board of directors of the Company shall oversee the vigil mechanism through Vigilance Officer, Mr. Ayush Abhay Shah, Director of company.

4. RECEIPT AND DISPOSAL OF INCIDENTS REPORTED

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share his or her questions, concerns, suggestion or complaints to person designated by the Company to Mr. Ayush Abhay Shah ("Vigilance Officer") for the above policy whose contact no is +91-9833631648 and email id is ayush@premcables.com, who will play the role of Vigilance Officer for the purpose of vigil mechanism to whom other directors and employees may report their concerns.

However, complaint may be submitted on a confidential basis by the complainant or may be submitted anonymously by filling out a reporting form and depositing the form at registered office of company.

5. INVESTIGATION ON THE REPORTING

On receipt of the incident, Vigilance Officer shall initiate the initial investigation either himself or by involving any other Officer of the Company or an outside agency for further appropriate investigation and needful action.

The record will include:

- a) Brief facts;
 - b) Whether the incident was raised previously;
 - c) Details of actions taken by for processing the complaint;
 - d) Findings of the Vigilance Officer
 - e) The recommendations of the Vigilance Officer / other action(s).
- In case the incident is reported against an employee, the Company strongly believes that the employee against whom the incident is reported (hereafter referred as 'subject') shall receive an opportunity to be heard and post his hearing, the incident should be reported to the Vigilance Officer.
 - The Subject should co-operate with the Vigilance Officer and should not withheld, destroy or tamper with any witness.
 - No incident of wrong doing against the subject shall be considered as maintainable unless there is good evidence in support of the incident.

6. REPORTING AND DISCIPLINARY ACTION

If an investigation leads the Vigilance Officer to conclude that an improper or unethical act has been committed, The Vigilance Officer shall recommend to the management of the Company to take disciplinary or corrective action as they may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings

of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this policy. The company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. However, a complainant who makes false allegations of unethical & improper practices or about alleged wrongful conduct shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

7. RETENTION OF DOCUMENTS

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of seven years.

8. COMMUNICATION:

Directors and Employees shall be informed of the Policy by publishing on the notice Board and on www.premcables.com, the website of the Company.

9. AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them in writing.

Adopted on:

**For and on behalf of Board of Directors
PREM CABLES PVT LTD**

**ABHAY PARASRAJ SHAH
Managing Director
DIN: 00160590**

ANNEXURE-A
PREM CABLES PVT LTD
PROTECTED DISCLOSURE FORM

Name of the Whistle Blower:

Designation.....

Department/Division.....

Location.....

Contact Number

E-mail.....

Correspondence address.....

I hereby declare, that the accompanying statements and supporting documentation (if any) is true and correct, to the best of my knowledge and in complete good faith.

Date :

Signature of the Whistle Blower

Name of the Subject:

Designation:.....

Department/ Division:

Location:

In case of Multiple Subjects

Name of the 2nd Subject: Designation:.....

Department/Division:.....

Location:

Name of the 3rd Subject: Designation:.....

Department/ Division:

Location:

(If the space provided is not sufficient, attach a separate sheet)

ANNEXURE B

FORMAT FOR REPORTING OF A COMPLAINT/PROTECTED DISCLOSURE

The Complaint/Protected Disclosure in respect of (insert subject matter of Complaint), as made by Ms./Mr.....(insert Name of the Complainant) , on(insert the date) against(mention Name of Subject) to.....insert the name of Officer to whom complaint has been made).

The other details in respect of the aforesaid Complaint/Protected Disclosure are as under:

Name of Subject/Employee Code	Date of receipt of Complaint	Date of initiation of investigation	Name of Outside Agency/Officer of Company if involved in respect of investigation	Date of conclusion of Investigation	Date of closure of complaint

(Signature of Vigilance Officer/MD)