

# **VIGIL MECHANISM & WHISTLEBLOWER POLICY**

## **PREAMBLE:**

Sparsh Industries Private Limited is firmly committed to conducting its business and relationships with all stakeholders in a manner that is lawful and ethically responsible and at all times, in a way that reflects the Company's values. Towards this end, The Company has devised a Vigil Mechanism in the form of a Whistle Blower Policy as prevalent from time to time, which lays down the principles and standards that should govern the actions of the Company.

The policy sets out arrangements that encourage individuals to report concerns about unethical behaviour, actual or suspected fraud or violations of the Code of Conduct & Ethics, knowing that in so doing, they are acting in the best interests of all stakeholders. This policy also ensures that the whistleblower will be protected from retaliation and reprisal.

## **SCOPE OF VIGIL MECHANISM:**

- Breach of any internal controls or Company policy relating to financial malpractice.
- Dangers to health and safety of the environment.
- Improper conduct or unethical behaviour.
- Breach of Business Integrity and Ethics.
- Violation of the Company's Code of Conduct & Ethics.
- Criminal offence.
- Pilferage of confidential/propriety information.

## **APPLICABILITY:**

This mechanism applies to all the Directors and employees of different departments of the Company.

## **DUTY TO REPORT:**

It is the policy of the Company that every Director and employee must, when reasonably suspect that a violation of Company's Code of Conduct and Ethics and such other things which may fall within the scope of Vigil Mechanism, has occurred or is occurring, report that potential violation. Reporting is crucial for early detection, proper investigation, remediation, and deterrence of violations of Company policies. No one should fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company's policy.

### **PROCEDURE FOR REPORTING:**

Any Director or Employee may report or make their disclosure to Mr. Sarvesh Agarwal, Director of the Company. Contact should be made by phone, email or in writing and should include as much detail and evidence as possible. Upon receipt of the disclosure the matter will be investigated immediately to ascertain all the facts and a recommendation will be made to the Board. The recommendation will include a revision of Company policies and procedures to reduce the risk of re-occurrence.

In order to protect the identity of the complainant, the Director will not issue any acknowledgement to the complainants and they are not advised to write their name / address.

### **CONTACT:**

The Contact details are as under:

**Name and Address: Mr. Sarvesh Agarwal**

**Director**

**Sparsh Industries Private Limited**

**165, Functional Industrial Estate**

**Patparganj, Delhi-110092**

**Email- [sarvesh@sparshgroup.in](mailto:sarvesh@sparshgroup.in)**

**Cont. No. +91-11-42654646**