



JAGAN LAMPS LIMITED

POLICY

ON

VIGIL MECHANISM / WHISTLE BLOWER POLICY

1.0. Purpose:

The policy provides a platform to employees & directors to disclose information internally, which he / she believes; shows serious malpractice, impropriety, abuse or wrong doing (herein after referred to as "Concern / Disclosure") within the company; without fear of reprisal or victimization.

2.0. Objectives:

- 2.1. To enable employees and directors to voice concerns - in a responsible and effective manner.
- 2.2. To provide a platform to employees and directors to disclose information internally, without fear of reprisal or victimization.
- 2.3. To enable disclosure of information, independently of line management.
- 2.4. To ensure that no employee of the company feels he/she is at a disadvantage while raising legitimate concerns.
- 2.5. To build & enforce the culture of strong governance, fairness and transparency.
- 2.6. To build the system of getting information about the malpractice, wrongdoing & unethical activities as & when takes place in the group.
- 2.7. To safe guard the COMPANY against such practice which may lead to any adverse or negative impact on the COMPANY .

3.0. Applicability:

- 3.1. To All regular employees of COMPANY, inclusive of Advisors, In-House Consultants/ Retainers , Directors and Employees on contract / Temporary workmen/ Associates .
- 3.2. Third Parties: The third parties including Vendors, Service providers, Partners, JV employees and Customers with concerns regarding any serious malpractice or impropriety within the COMPANY.
- 3.3. Any other stake holder directly or indirectly associated with the group.

4.0. Coverage:

- 4.1. The whistle blower's role is that of a reporting party with reliable information. They are not required and expected to act as investigators or be involved in deciding what course of remedial action is warranted in a given case. Although, the complainant is not expected to provide complete evidence in proof of the allegation, he needs to demonstrate to the ombudsperson that there are sufficient and valid grounds for concern.
- 4.2. This Policy is intended to deal with concerns which are to be investigated and inappropriate cases may lead to the implication of other procedures e.g. disciplinary action.

4.3. This Policy will not cover issues relating to employment related grievances including PMS, promotions and transfers etc. which will be separately dealt under Employee Grievance Handling.

Malpractice, impropriety, abuse and wrongdoing can include a whole variety of issues and some are listed below. However, this is not a comprehensive list but is intended to illustrate the sort of issues, which may be raised under this Policy.

Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law (e.g. insult or defamation).

Breach of any Policy or Manual or Code of conduct adopted across COMPANY.

Fraud and corruption (e.g. to solicit or receive any gift/reward as a bribe)

Any instance of failure to comply with legal or statutory obligation either for and on behalf of the COMPANY or in any personal capacity in the course of discharging duties of the COMPANY

Any instance of any sort of financial malpractice

Abuse of power (e.g. sully/harass ment)

Any other unethical or improper conduct.

4.4. Any undue favor or restrain based on caste, region and gender.

5. Process owner of the Policy :

The COMPANY Ombudsperson will be the process owner of this Policy.

COMPANY Ombudsperson:

Name	Contact No.
Mr. Ajay Kumar Tiwari	8529561809

6. Disclosure:

The employees / external stakeholders like Vendors, Suppliers, Service providers, Customers, Financiers, Shareholders etc., can make a disclosure through the following communication modes:

Oral Disclosures

If a whistle blower desires to make an oral disclosure he/she may do so through telecom or by personally meeting the Ombudsperson. If the disclosure is found to be valid, the said disclosure will be considered for an investigation as laid out in the procedure.

Written Disclosure

If a whistle blower desires to make disclosure he/ she may do so by sending a written communication at: admin@jaganlamps.com

7.0. Assurance under the policy (to the Whistleblower):

- 7.1. All possible precautions will be taken to maintain the confidentiality of the identity of the Whistle Blower, barring where such disclosure is required strictly for the purpose of law or to facilitate the investigation process.
- 7.2. The COMPANY will not tolerate any harassment or victimization (including informal pressures) against the whistle blowers and will take appropriate action to protect the whistle blowers when he/she makes the disclosure in good faith.
- 7.3. The COMPANY will provide adequate and timely support and protection to the whistle blowers in the event of facing any civil or criminal action in consequence to the disclosure made to the COMPANY.
- 7.4. If a whistle blower believes that she/he has been victimized for raising a disclosure under this policy, he/she may file a written complaint to the chairperson of the audit committee requesting an appropriate remedy.
- 7.5. The investigation shall be carried out in a neutral fact finding manner by an appropriate agency.

8. Power to change the policy:

This Policy can be changed or modified or withdrawn or abrogated at any time by the Audit Committee of COMPANY.

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