



# **Whistle Blower Policy & Vigil Mechanism**

**Laxmi India Finleasecap Private Limited**

(Sapne dekho Bade Dekho Hamare Saath Unhe Pura Hote Hue Dekho)



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## **1. Introduction**

Whistle Blower Policy and Vigil Mechanism provides a channel to the employees to report to the management about unethical behavior, actual or suspected fraud or violation which they are or become aware so that action can be taken immediately to resolve the problem.

Taking into consideration the above requirement, the Company has set-up and adopted the following Vigil Mechanism which shall provide adequate safeguards against victimization of employees and directors and shall be overseen by Vigilance Officer (Chief Financial Officer-called “CFO”) of the Company.

The Vigil Mechanism of the Company provides direct access to the Chief Financial Officer of the Company. In the case of repeated frivolous complaints being filed by a director or an employee, Chief Financial Officer may take suitable action against the concerned director or employee including reprimanding them.

## **2. Regulatory Requirements**

The Companies Act 2013 under the provisions of Section 177 read-with Rules made there under (as may be amended from time to time) has mandated that following Companies shall establish a vigil mechanism for directors and employees to report genuine concerns:

- Listed Companies.
- Companies accepting deposits from public.
- Companies that have borrowed moneys from Banks/PFIs in excess of fifty crore rupees.

## **3. About the policy**

It covers events which have taken place / suspected to have taken place or may take place in relation to 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/or other activities on account of which the interest of the Company or of the public at large is affected, however, the mechanism does not release the employees from their duty of confidentiality in the course of their work and nor can it be used as a route for raising malicious or unfounded allegations about a personal situation.

All Employees and Directors of the Company are covered under the scope of the mechanism in relation to matters concerning the Company.

## **4. Procedure**

- a. Where any director or employee finds or observes any of the events which have taken place / suspected to have taken place or may take place in relation to 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/or other



activities on account of which the interest of the Company get affected shall be reported in writing by the complainant as soon as possible.

- b. The Complaint / Grievances shall be submitted in a closed and secured envelope to the Vigilance Officer of the Company i.e. Chief Financial Officer of the Company.

In order to protect identity of the complainant, the Vigilance officer will not issue any acknowledgement to the complainant and the complainants are advised neither to write the name / address of the complainant on the envelope nor to enter into any further correspondence with the Vigilance officer. Vigilance officer assures that in case any further clarification is required they will get in touch with the complainant.

- c. All Complaint / Grievances should be addressed to the Vigilance Officer of the Company. The contact details of the Vigilance Officer are as under:-

Chief Financial Officer,  
Laxmi India Finleaseap Private Limited  
2 DFL Tower, Gopinath Marg  
MI Road Jaipur 302001 Rajasthan

- d. Complaint / Grievances against the Vigilance Officer should be addressed to the Managing Director. The contact details of the Managing Director are as under:

Managing Director,  
Laxmi India Finleaseap Private Limited  
2 DFL Tower, Gopinath Marg  
MI Road Jaipur 302001 Rajasthan

- e. On receipt of the Complaint / Grievances, the Vigilance Officer/ Managing Director, as the case may be, shall make a record of the Complaint / Grievances and may also ascertain from the complainant details for further appropriate investigation and needful action.

## **5. Investigation**

1. All Complaints / Grievances will be recorded and thoroughly investigated. The Chief Financial Officer may investigate and may at its discretion consider involving any other Officer of the Company.
2. Suspect(s) shall co-operate with the Chief Financial Officer or any of the Officers appointed by him in this regard.



3. Suspect(s) have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with and witness shall not be influenced, threatened or intimidated by the Concerned Person(s).
4. Unless there are compelling reasons not to do so, Suspect(s) will be given the opportunity to respond to material findings contained in the investigation report.  
No allegation of wrong doing against a suspect shall be considered as maintainable unless there is good evidence in support of the allegation.
5. Suspect(s) has a right to be informed of the outcome of the investigations.
6. The investigation shall be completed normally within 90 days of the receipt of the Complaint / Grievances and is extendable by such period as the Chief Financial Officer deems fit.

## **6. Decision and Reporting**

1. In case prima facie case exists against the suspect, then Chief Financial Officer shall forward the said report with its recommendation to the concerned disciplinary authority for further appropriate action in this regard or shall close the matter, for which he shall record the reasons in writing. Copy of above decision shall be addressed to the Vigilance Officer, the complainant and the suspect.
2. In case the suspect is a Vigilance officer of the Company, the Complaint / Grievance shall be addressed to the Managing director who, after examining such complaint shall forward the matter to the Board of Directors. The Board of Directors after providing an opportunity to the suspect to explain his position and after completion of investigation shall submit a report along with its recommendation to the concerned disciplinary authority for further appropriate action in this regard or shall close the matter, for which he shall record the reasons. Copy of the above decision shall be addressed to the Vigilance Officer and the complainant.
3. In case the suspect is any Director of the Company, the Vigilance officer after examining the complaint shall forward the same to the Managing Director and if deemed fit the Managing Director shall appropriately and expeditiously investigate such complaint.
4. A complainant who makes false allegations of unethical and improper practices or about wrongful conduct of the suspect to the Vigilance officer shall be subject to appropriate disciplinary action in accordance with the rules of the Company.
5. If the alleged fraud or misconduct is proven after investigation, the Vigilance Officer may impose such penalty / fine as it may deem fit depending upon nature of fraud or unethical act done by the person

## **7. Secrecy / Confidentiality**

The complainant, Vigilance officer, the Suspect and everybody involved in the process shall:

- a. Maintain confidentiality of all matters.
- b. Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.



- c. Not to keep the papers unattended anywhere at any time and shall keep the electronic mails / files under password.

#### **8. Retention of Documents**

All complaint / grievance along with the results of Investigation relating thereto, shall be retained by the Vigilance Officer for a period of 5 (five) years or such other period as specified by any other law in force, whichever is more.

#### **9. Administration and Review of the Policy**

The Vigilance Officer shall be responsible for the administration, interpretation, application and review of this policy. The Vigilance Officer shall be empowered to bring about necessary changes to this Policy, if required at any stage with the concurrence of the Audit Committee.

#### **10. Annual Affirmation**

The details of Vigil Mechanism shall be disclosed in the Board of Directors Report every year, subject to the applicable provisions for the time being in force.