

## **VIGIL MECHANISM POLICY**

### **1. PREAMBLE**

Section 177 of the Companies Act, 2013 requires every class of Company to establish a vigil mechanism for the directors and employees to report genuine concerns in such manner as may be prescribed. The Company proposes to establish a Vigil Mechanism and to formulate a policy for the same.

### **2. POLICY OBJECTIVES**

The Company is committed to developing a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct. 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. A Vigil mechanism provides a channel to the employees and Directors to report to the management concerns about unethical behavior, actual or suspected fraud or violation of the company's policy. The mechanism provides for adequate safeguards against victimization of employees and Directors to avail of the mechanism and also provide for direct access to the Chairman/ Managing Director/ Chairman of the Audit Committee in exceptional cases. 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 about a personal situation.

### **3. SCOPE**

Following scopes are covered in the Policy;

1. Abuse of authority,
2. Breach of any contract,
3. Negligence causing substantial and specific danger to employees health and safety,
4. Manipulation of company's data or any records,
5. Financial irregularities, including fraud, or suspected fraud,
6. Criminal offence,
7. Pilferation of confidential or propriety information,
8. Deliberate violation of law or regulation,
9. Wastage or misappropriation of company funds or assets,
10. Breach of employee Code of Conduct or Rules,

### **4. ELIGIBILITY**

All Employees of the Company including directors are eligible under the Policy in relation to matters concerned.

### **5. Contact details**

Employees and Directors should address to the Chairman of the Company or to the Chairman of the Audit Committee or Chairman in exceptional Cases.

The contact details of the Chairman of the Company

**Name: Mr. Ramesh Kejriwal**

**Email: [rbk@parksonspackaging.com](mailto:rbk@parksonspackaging.com)**



## **6. Process**

On receipt of the mailed/handwritten complaint, the Vigilance Officer / Chairman/ Chairman of the Audit Committee, as the case may be, shall make a record of the same. He shall also carry out initial investigation either himself or by involving any other Officer of the Company before referring the matter to the Audit Committee of the Company for further appropriate investigation and needful action.

The record shall include:

- i. Brief facts;
- ii. Whether the same complaint was raised previously by anyone, and if so, the outcome thereof;
- iii. Details of actions taken by Vigilance Officer / Chairman for Processing the complaint;
- iv. Findings of the Audit Committee;
- v. The recommendations of the Audit Committee/ other action(s).

## **7. INVESTIGATION**

All complaints under this policy will be recorded and thoroughly investigated. The investigation shall be completed normally within 90 days of the receipt of the same and is extendable by such period as the Audit Committee deems fit.

## **8. SECRECY / CONFIDENTIALITY**

The complainant, Vigilance Officer, Members of Audit Committee, the Subject and everybody involved in the process shall:

- i. Maintain confidentiality of all matters and name of the complainant under this Policy.
- ii. Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.
- iii. Not keep the papers unattended anywhere at any time.
- iv. Keep the electronic mails / files under password.

## **9. ACCESS TO CHAIRMAN OF THE AUDIT COMMITTEE**

The complainant shall have right to access Chairman of the Audit Committee Directly in exceptional cases and the Chairman of the Audit Committee.

## **10. COMMUNICATION**

A vigilance mechanism cannot be effective unless it is properly communicated to employees. Employees shall be informed through by publishing in notice board at each offices/plants of the company.

## **11. ADMINISTRATION AND REVIEW OF THE POLICY**

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

