

BLR LOGISTIKS (I) LTD

WHISTLE BLOWER POLICY (VIGIL MECHANISM)

Introduction

In the Companies Act, 2013 under Section 177 read with Companies (Meetings of Board and its powers) Rules 2014 mandates every listed company or every company having borrowed loans of Rs.50 crore or more or having accepted the deposits from public shall establish a vigil mechanism for the directors and employees to report genuine concerns. Such a vigil mechanism shall provide for adequate safeguards against victimization of persons who use such mechanism and make provision for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases.

Scope & coverage

- (a) Procedure to disclose any suspected unethical and/or improper practice taking place anywhere in the Company.
- (b) Protection available to the person making such disclosure in good faith.
- (c) Mechanism for taking action and reporting on such disclosures to the relevant authority within the Company.
- (d) Relevant authority and its powers to review disclosures and direct corrective action relating to such disclosures.

Objective

The Company seeks to maintain the highest ethical and business standards in the course of conduct of its business by promoting transparency and ethical conduct in all spheres of business operations/activity.

The Whistle blower policy seeks to provide a mechanism for its staff, vendors or customers to disclose any unethical and/or improper practice(s) taking place in the Company, for appropriate action and reporting. Through this policy, the Company provides the necessary safeguards to all Whistle Blowers for making disclosures in good faith.

Definitions

The definitions of some of the key terms used in this policy are given below:

- (a) “**Whistle Blower**” means any Employee, Customer or Vendor of the Company, making a Disclosure under this policy.
- (b) “**Disclosure**” means any communication in relation to an unethical practice (including anonymous disclosures, by any means) made in good faith by the Whistle Blower to the designated authority under this policy.

(c) “**Subject**” means a person against or in relation to whom a Disclosure is made under this policy.

(d) “**Unethical practice**” means and includes, but not limited to, the following suspected activities/ improper practices being followed in the Company:

(i) Manipulation of Company data / records.

(ii) Abuse of authority at any defined level in the Company.

(iii) Disclosure of confidential / proprietary information to unauthorized persons.

(iv) Any violation of applicable laws and regulations to the Company, thereby exposing the Company to penalties/ fines.

(v) Any instances of misappropriation of Company assets.

(vi) Activity violating any laid down Company policy, including the Code of Conduct.

(vii) Indulging in corrupt practices, misappropriation, fraudulent conversion and the like, breaching/ subverting the rules, procedures for personal gain, committed singly or in concert

(viii) Gender related misconduct, harassment of any kind including physical, mental abuses

(ix) Malicious acts, slander, libel and such acts as may cause injury to the reputation or business interests of the company

(x) Any other activities whether unethical or improper in nature and injurious to the interests of the Company.

Applicability

This policy is applicable to the following:

(a) All Staff of the Company.

(b) All Customers of the Company.

(c) All Vendors interacting with the Company.

Procedure for Reporting

Any Employee, Vendor or Customer of the Company may make a Disclosure, duly addressed to Managerial Official. His contact details are:

Mr. Uday V. Malya

Designation: Director & CFO

Unit-202, 2nd Floor, D-Wing, Lotus Corporate Park,

Off Western Express Highway, Goregaon (East), Mumbai-400063.

Integrity lines are exclusively dedicated for disclosures by the whistle Blowers over phone.

Phone No: 022-40419090 Mobile No: +91 9820698756.

Alternatively, the Disclosure can be e-mailed to uday.malya@blrlogistiks.com

Where anonymity is insisted, the informer may state so.

While making the disclosure, the whistle blower should take into consideration the applicable rules articulated under this policy.

(a) It is strongly advised that the Whistle Blower discloses his/ her identity in a covering letter for ensuring timely resolution of the issue and also for ensuring that adequate protection is granted to him/ her under the relevant provisions of this policy.

