



STYLAM INDUSTRIES LIMITED

VIGIL MECHANISM AND WHISTLE BLOWER POLICY

1. Objective:

The Company is committed to ensure compliance of all the applicable laws, Code of Corporate Governance & Ethics adopted by it and policies and procedures framed by it from time to time, by the Directors and employees of the Company.

Purpose of this policy is to provide a framework through which all the Directors and employees report their genuine concerns and actual / potential violations to the designated officials of the Company fearlessly, as provided in Section 177 of the Companies Act, 2013 and Rules made thereunder, Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 as amended from time to time, and other applicable laws.

2. Who can report:

Any whistle-blower among the Directors and employees of the Company can report genuine concerns and actual or potential violations.

3. Concerns / violations that can be reported:

- Deliberate or unintentional non - compliance of the applicable laws,
- Improper and unlawful practices,
- Cases of frauds,
- Financial and accounting irregularities,
- Misappropriation of Company's funds,
- Violation of Code of Corporate Governance & Ethics inter-alia nondisclosure of conflict of interest or indulging in insider trading.

4. Lodging of Complaints:

Complaints on the matters listed at paragraph 3 above, including anonymous, can be directly reported/ lodged with the following designated official:

Mr Sanjeev Kumar Sehgal
Company Secretary & Compliance Officer
C/O Stylam Industries Limited
SCO-14, Sector 7-C Chandigarh- 160019, India Phone
No : +911725021555 Mobile No: +917508003099
Email Id : cs@stylam.com



Stylam Industries Limited

Regd. Office: SCO 14, Sector 7C, Madhya Marg, Chandigarh (INDIA)-160019, **T:** +91-172-5021555/5021666, **F:** +91-172-5021495

Works I: Plot No. 192-193, Industrial Area Phase-1, Panchkula (Haryana) INDIA - 134109, **T:** +91-172-2563907/2565387

Works II: Village Manak Tabra towards Raipur Rani, Mattewala Chowk, Distt. Panchkula (Haryana)

W: www.stylam.com, **CIN:** L20211CH1991PLC011732 (Govt. of India recognised Star Export House)

Alternatively, complaints can also be sent to the Chairman of Audit Committee of the Company directly. The chairman of the Audit Committee is authorized to prescribe suitable directions in this regard.

Name and Address of Chairman-Audit Committee: Mr Satpal Garg
607 Sector -7 Panchkula
Haryana-134109

5. Investigation Procedure:

All protected Disclosures under this policy will be recorded and thoroughly investigated. The Vigilant and Ethics officer will carry out the investigation either himself/herself or by involving any other officer of the company and/or Chairman of Audit Committee before referring the matter to the Audit Committee of the Company.

The Audit Committee, if deems fit, may call for further information or particulars from the complainant and its discretion, consider involving any other/additional Officer of the company and or/Committee and /or outside agency for the purpose of investigation

The investigation shall be completed normally within 90 days of the receipt of the protected disclosure and it extendable by such period as the Audit Committee deems fit.

Any member of the Audit Committee or other officer having any conflict of interest with the matter shall disclose his/her concern/ interest forthwith and shall not deal with the matter.

6. Protection and Safeguards:

Both CGEC and the Audit Committee shall ensure

- a) protection of complainant/ witness, if any, against any harassment and victimization
- b) protection of the complainant identity

7. Frivolous Complaints:

Audit Committee shall take suitable action against the complainant for any frivolous complaint.

8. Miscellaneous:

a. All the relevant documents namely complaint or the gist of oral complaint, as the case may be, information/ document obtained during the investigation as evidence, including from witness, if any shall be fully secured to avoid any tampering and shall be preserved for a period of 2 years from the date of the closure report or the investigation report, as the case may be.

b. In exceptional cases, as may be decided after considering the facts of such cases, the whistle blower / complainant shall be provided direct access to the Chairman of the Audit Committee.

Recommended by

Chairman
Audit Committee

Approved by

Chairman
For and on behalf of Board of Directors

