

# VIGIL MECHANISM/WHISTLE BLOWER POLICY

Updated on 10<sup>th</sup> February, 2021

Regd Office: - C41-50, SEZ, Sector-3, Pithampur, Dist. Dhar (M.P.) 454775, url: [www.flexituff.com](http://www.flexituff.com)  
CIN: L25202MP1993PLC034616, Email: [mail@flexituff.com](mailto:mail@flexituff.com), Fax: 91-7292-401684, Tel: 91-7292-420200

## **POLICY ON VIGIL MECHANISM/ WHISTLE BLOWER**

### **1. INTRODUCTION**

**Flexituff Ventures International Limited** (“the Company”) is committed to conducting business with integrity, including in accordance with all applicable laws and regulations. FVIL's expectations with respect to business ethics are contained in the Code of Conduct.

### **2. MATTERS TO BE INCLUDED**

**Reportable Matter** means a genuine concern concerning actual or suspected:

- Fraudulent practices, such as improperly tampering books and records, theft of company property;
- Corruption, including bribery and money laundering;
- Breaches of the Code of Conduct.
- Leak of Unpublished Price Sensitive Information.

Please note that complaints concerning personal grievances, such as professional development issues or Employee compensation, are not Reportable Matters for purposes of this Policy.

### **3. ELIGIBILITY**

All Directors and Employees of the Company are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company

### **4. PROCEDURE**

All Protected Disclosures should be reported in writing by the complainant as soon as possible, not later than 30 days after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English/Hindi.

The Protected Disclosure should be submitted under a covering letter signed by the complainant in a closed and secured envelope and should be super scribed as “Protected disclosure under the Vigil Mechanism/Whistle Blower Policy” or sent through email with the subject “Protected disclosure under the Vigil Mechanism/Whistle Blower Policy”. If the complaint is not super scribed and closed as mentioned above, the protected disclosure will be dealt with as if a normal disclosure.

Any instance of leak of UPSI shall be on the basis of a direct first-hand experience of the Whistle Blower. It should not be based on any secondary, unreliable source or any form of informal communication. The leak of UPSI may be reported by an email to the Compliance Officer at [cs@flexituff.com](mailto:cs@flexituff.com).

All other Protected Disclosures should be addressed to the Vigilance Officer of the Company or to the Chairman of the Audit Committee in exceptional cases.

In order to protect the identity of the complainant, the Vigilance Officer will not issue any acknowledgement to the complainants and they are not advised neither to write their name/ address on the envelope nor enter into any further correspondence with the Vigilance Officer.

Anonymous / Pseudonymous disclosure shall not be entertained by the Vigilance Officer.

On receipt of the protected disclosure the Vigilance Officer shall detach the covering letter bearing the identity of the Whistle Blower and process only the Protected Disclosure.

The Contact detail of the Vigilance Officer is as under:

**Name and Address:**

**Rishabh Kumar Jain**

**Company Secretary & Compliance Officer**

**Flexituff Ventures International Limited**

**C41-50, SEZ, Sector-3, Dist. Dhar, Pithampur (M.P.)-454775**

**Mail ID- cs@flexituff.com**

## **5. CONFIDENTIALITY**

The complainant, Vigilance Officer and everybody involved in the process shall, maintain confidentiality of all matters under this Policy, discuss only to the extent or with those persons as required under this policy for completing the process of investigations and keep the papers in safe custody.