

**POLICY ON WHISTLE BLOWER OVER AND ABOVE CURRENT VIGIL  
POLICY OF VEEDOL**

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**Annexure I**

Whistle Blower Complaint Form

## 1. Purpose

The Company is committed to conducting its business with integrity, transparency, and ethical standards.

The purpose of this Whistle Blower Policy is to:

- Provide a mechanism for employees and stakeholders to report unethical behaviour, fraud, misconduct, or violations of company policies or laws.
- Encourage individuals to raise concerns without fear of retaliation.
- Ensure that concerns are investigated in a fair, transparent, and timely manner.

This policy is over and above the established Vigil Mechanism Policy of Veedol, in accordance with the provisions of the Companies Act, 2013.

## 2. Scope

This policy applies to:

- Employees (permanent, contractual, trainees, interns)
- Directors
- Consultants
- Vendors and suppliers
- Channel Partners

### “Matters Not Covered”

- routine employment grievances,
- appraisal disputes,
- transfer/posting issues,
- interpersonal conflicts, unless involving fraud, retaliation, corruption, harassment, or serious misconduct.

The whistle blower is encouraged to raise concerns in good faith and with reasonable belief that the information disclosed is true.

## 3. Reportable Concerns

Whistle blowing may relate to concerns including but not limited to:

### Financial and Fraud Related

- Fraud or suspected fraud
- Financial misappropriation
- Accounting irregularities
- Manipulation of company records

### **Ethical Violations**

- Bribery or corruption
- Conflict of interest
- Abuse of authority
- Misuse of company assets

### **Regulatory and Legal Violations**

- Violation of company policies
- Violation of laws or regulations
- Insider trading
- Data privacy violations

### **Workplace Misconduct**

- Harassment or discrimination
- Retaliation against employees
- Serious misconduct affecting workplace integrity

## **4. Whistle Blower Protection**

The Company will ensure that:

- Whistle blowers are protected from retaliation or victimization.
- No Whistle Blower (as mentioned in Point No. 2 of this policy) will suffer termination, demotion, harassment, or discrimination for raising genuine concerns.
- If the complaint warrants, concerned accused will be terminated/ transferred or the duties will be re-assigned.
- Any retaliation against a whistle blower will result in disciplinary action.

## **5. Confidentiality**

The identity of the whistle blower will be kept strictly confidential. Information relating to the complaint will be disclosed only to individuals involved in the investigation process.

## **6. Reporting Channels**

Concerns may be reported through any of the following channels:

▪ **Email**

Designated email ID: **ethics@Veedol.com**. **The Audit Committee Chairman shall have access to the mails received on this email ID.**

▪ **Written Complaint**

Complaints may be submitted to the Registered or Corporate Office of the Company addressing to:

- **Chairman –Audit Committee**
- **Company Secretary & Compliance Officer**

### **7. Anonymous/Pseudonymous Complaints**

The Company encourages whistle blowers to disclose their identity for better investigation.

However, anonymous /pseudonymous complaints may also be considered, provided sufficient information is available to conduct an investigation.

Further, anonymous or pseudonymous complaints may be investigated at the discretion of the Audit Committee Chairman based on credibility, specificity, seriousness, and availability of verifiable information.

Anonymous complaints containing verifiable facts, documentary evidence, specific instances, dates, transactions or identifiable persons may be taken up for preliminary review. Vague, frivolous, speculative or mala fide anonymous complaints may not ordinarily be investigated.

Where technically feasible, the Company may provide a confidential mechanism enabling anonymous complainants to track the status of complaints through a unique reference number or protected communication channel, without requiring disclosure of identity.

### **8. Ad-hoc Committee**

The Chairman of Audit Committee shall be at a liberty to constitute an ad-hoc committee depending upon the particulars of any whistle blower complaint so received.

### **9. Investigation Process**

Upon receipt of a complaint:

1. The complaint will be acknowledged within 7 working days from the date of receipt of complaint.
2. A preliminary review will be conducted within 15 working days from the date of receipt of complaint.
3. If required, a formal investigation will be initiated.
4. An interim Report will be prepared within 45 working days and shall be circulated to the Audit Committee for information.
5. The investigation will be conducted by the ad-hoc Committee and concluded within 90 working days from the date of receipt of complaint and outcome will be intimated within next 7 working days thereof.

The Company/Audit Committee may engage external legal counsel, forensic auditors, investigators or consultants where deemed necessary. All investigations will follow principles of fairness and confidentiality.

If a complaint involves a member of the Audit Committee or its Chairman, the Complainant can escalate the matter to the Chairman of the Board.

#### **10. Role of the Audit Committee**

The Audit Committee shall oversee the functioning of the whistle blower mechanism. Responsibilities include:

- Reviewing complaints received
- Ensuring independent investigation
- Monitoring resolution of cases
- Ensuring protection of whistle blowers

Serious complaints involving senior management will be directly reviewed by the Audit Committee.

#### **11. False Complaints**

While the Company encourages reporting of genuine concerns, malicious or knowingly false allegations may result in disciplinary action.

However, a complaint made in good faith will not attract disciplinary action even if it is not substantiated.

## **12. Record Retention**

All whistle blower complaints and investigation records will be securely maintained by the Company for a minimum period as required under applicable laws and company policy.

## **13. Communication and Awareness**

The Company will ensure that this policy is:

- Communicated to all employees
- Available on internal systems
- Disclosed on the website of the Company and web link is provided in the Annual Report. Included in employee induction & periodic awareness programs

## **14. Review of Policy**

This policy will be reviewed periodically by the Management and Audit Committee to ensure compliance with regulatory requirements and governance standards.

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**Annexure I****Whistle Blower Complaint Form****(To be used for reporting unethical conduct, fraud, or policy violations)****1. Details of the Complainant (Optional)****Name of Complainant:** \_\_\_\_\_**Employee ID (if applicable):** \_\_\_\_\_**Department / Function:** \_\_\_\_\_**Contact Number:** \_\_\_\_\_**Email Address:** \_\_\_\_\_ *I wish to remain **anonymous****(Note: Anonymous complaints may also be submitted. However, providing contact details may help in better investigation.)***2. Details of the Complaint****Nature of Complaint / Misconduct Reported:** Fraud Corruption / Bribery Financial Irregularity Conflict of Interest Misuse of Company Assets Harassment / Misconduct Violation of Company Policy Other (please specify): \_\_\_\_\_**3. Details of the Incident****Date of Incident:** \_\_\_\_\_**Location of Incident:** \_\_\_\_\_**Name(s) of Person(s) Involved (if known):****Designation / Department:****Relationship with Company (employee/vendor/contractor etc.):****4. Description of Concern**

Please provide detailed information about the concern or incident, including how you became aware of it.

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**5. Evidence Available**

Please list any documents, emails, records, or other evidence supporting your complaint.

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**6. Witnesses (if any)**

Name(s) and contact details of any witnesses:

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**7. Declaration**

I declare that the information provided in this complaint is true and correct to the best of my knowledge, and I am reporting this concern in good faith.

**Signature (if disclosed):** \_\_\_\_\_

**Date:** \_\_\_\_\_

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