

JINDAL PHOTO LTD.

VIGIL MECHANISM FOR DIRECTORS AND EMPLOYEES:

The Company believes in the conduct of the affairs of its business should be in a fair and transparent manner.

VIGIL MECHANISM

Vigil Mechanism is hereby formulated to report genuine concerns or grievances of Directors and Employees in compliance to the provisions of the Section 177 of Companies Act, 2013, Rules made thereunder and Regulation 22 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

OBJECTIVE

To encourage the Employees to report to the management about suspected unethical or immoral behaviours, malpractices, wrongful conduct, fraud violation of the Company's policy including Code of Conduct, violation of law or questionable accounting or auditing matters by any employee/ director of the Company without any fear of retaliation

SCOPE

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, violation of any law/regulations/Company rules, manipulations, negligence causing danger to public health and safety, misappropriation of monies, financial irregularities, including



fraud, or suspected fraud, criminal offence, pilferation of confidential/propriety information, breach of Code of Conduct or rules, any other unethical, biased, favored, imprudent event and other matters or activity on account of which the interest of the Company is affected and formally reported by Whistle Blowers.

PROCEDURE

Any Director or Employee may report his genuine concern or grievance to **Mr. M.K. Rastogi (DIN 07585209)**, Managing Director.

In case complaints relates to the Managing Director and Non-Independent Directors, and in an exceptional and appropriate case, any employee may report his/her concern to **Mr. Vinumon K.G. (DIN 07558990)**, Chairman of the Audit Committee. The Contact details of the Managing Director and the Chairman of the Audit Committee are given below:

Mr. M.K. Rastogi (DIN 07585209),

(Managing Director)

Jindal Photo Ltd.

Plot No. 12, Sector B 1, Local Shopping Complex, Vasant Kunj,
New Delhi - 110070.

Email:photo_acc@jindalgroup.com

Ph.No 011-26139256.

Mr. Vinumon K.G.

(DIN 07558990)

Chairman-Audit Committee,

Jindal Photo Ltd.



Plot No. 12, Sector B-1, Local Shopping Complex,
Vasant Kunj, New Delhi-110070.

Email: kgvinumon@yahoo.com

Ph.No 011-26139256.

The Managing Director or the Chairman of the Audit Committee, as the case may be, on receipt of complaint shall have the matter investigated in a fair and unbiased manner.

- The management will order appropriate action on the basis of findings as a result of the investigation.
- Every quarter a summary of all the complaints received will be put up to the Chairman of the Audit Committee.

PROTECTION

- No unfair treatment, discrimination, harassment, victimization or any other unfair employment practice will be meted out under the Vigil Mechanism.
- Identity of the employee making the disclosure shall be kept confidential to the extent possible and permitted under law. The employees are cautioned that their identity may become known for reasons e.g. during the investigations carried out by the Investigators.
- While Management is determined to give appropriate protection to the genuine Whistle Blower, the employees at the same time are advised to refrain from using this facility for furthering their own personal interest. If proved, in such cases disciplinary action will be taken.

