



AFFLATUS GRAVURES PRIVATE LIMITED

VIGIL MECHANISM POLICY

INTRODUCTION:

Section 177(9) of the Companies Act 2013 read with Rule 7 of Companies (Meetings of Board and its Powers) Rules, 2014 (“the Rules”) envisages that every listed company as well as other specified companies (specified companies covers the companies which have borrowed money from banks and public financial institutions in excess of Rs. 50 Crore) shall establish a vigil mechanism for Directors and employees to report their genuine concerns or grievances and have a redressal mechanism for investigating such matters. This mechanism will report to the Director (Director In-charge) nominated by the Board of Directors of the Company in this regard and the details of such vigil mechanism should be disclosed in the Board’s Report to the Shareholders.

Scope:

It covers all the Permanent employees and Director of the Company.

Definition:

- The Company means “Afflatus Gravures Private Limited.”
- Employees mean all permanent employees of the Company.
- Directors means define as per Section 2(34) of the Companies Act, 2013.
- Policy or This Policy means, “Vigil Mechanism Policy.”
- Director In- charge means nominated by the Board of Directors of the Company.
- Compliance officer means Company Secretary of the Company.

Interpretation:

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 read along with the rules as amended from time to time.

Guidelines:

Protection under Policy The vigil mechanism shall provide for adequate safeguards against victimization of employees and directors who avail of the vigil mechanism and report their genuine concerns or grievances.

Disclosure & Maintenance of Confidentiality

Employees and directors shall report to through e-mail addressed to vidhi.sharma@afflatusgravure.com. Confidentiality shall be maintained to the greatest extent possible.



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Frivolous complaints

In case of repeated frivolous complaints being filed by a director or an employee, the Director in-charge may take suitable action against the concerned director or employee including reprimand.

Procedure for filing a complaint or voicing a concern

Any person whether an employee or not, may raise a concern or file a complaint

- ☐ In person with the office of the Director In-charge
- ☐ Through telephone (secure hotline)
- ☐ Through email at vidhi.sharma@afflatusgravure.com
- ☐ In writing (hard copy) to

The Director In-charge
A-10 A, Sector -68, Noida, U.P.

Filing a complaint

Full details of the alleged breach including location, date and time, persons involved, any witnesses, documents if available and the identity of the complainant should be provided. Anonymous complaints may also be investigated if there is some prima facie basis for such complaints but employees are encouraged to provide their names for follow up discussions and for verification of the veracity of the complaint.

Savings:

This policy can be changed, modified or abrogated at any time by the Board of Directors of the Company.

Notification:

The Compliance Officer shall be responsible for intimating to all Directors and Departmental heads of any changes in policy.

This policy as amended from time to time shall be disclosed by the company on its website and in the Board's report.
