

# LUX INDUSTRIES LIMITED

## Whistle Blower Policy

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## WHISTLE BLOWER POLICY

### 1. Preface

- The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour.
- The Company is committed to developing a culture where it is safe for all employees, directors and Directors to raise concerns about any poor or unacceptable practice and any event of misconduct.
- Section-177 (9) Companies Act, 2013 prescribes the establishment of '**Vigil Mechanism**' by all listed companies.
- SEBI vide its Board Meeting Dated 13.02.2014, has made it mandatory for all listed companies to establish a mechanism called "**Whistle Blower Policy**" and further as prescribed in Regulation 22 of SEBI (Listing Obligation And Disclosure Requirements) Regulations, 2015 as amended from time to time listed entity shall formulate a vigil mechanism for directors and employees, directors to report genuine concerns.
- Since both Whistle Blower Policy and Vigil Mechanism aim at achieving the same end, the company has adopted the Whistle Blower Policy which will serve the purpose of both the policies / mechanisms for employees, directors on 29.05.2014 and further in meeting held on 17.05.2018 board has also cover directors under this policy as prescribed in Regulation 22 of SEBI SEBI (Listing Obligation And Disclosure Requirements) Regulations, 2015 as amended from time to time.
- The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects employees, directors, wishing to raise a concern about serious irregularities within the Company.
- The policy neither releases employees, directors from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

### 2. Policy

No adverse action shall be taken or recommended against an employees, directors in retaliation to his disclosure in good faith of any unethical and improper practices or alleged wrongful conduct. This policy protects such employees, directors from unfair termination and unfair prejudicial employment practices. However, this policy does not protect an employees, directors from an adverse action which occurs independent of his disclosure of unethical and improper practice or alleged wrongful conduct, poor job performance, any other disciplinary



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action, etc. unrelated to a disclosure made pursuant to this

### 3. Definitions

“Disciplinary Action” means any action that can be taken on the completion of / during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.

“Employees, directors” means every permanent employees, directors on the roll of the Company

“Protected Disclosure” means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

“Subject” means a person against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

“Whistle Blower” is someone who makes a Protected Disclosure under this Policy.

“Whistle Officer” or “Committee” means an officer or Committee of persons who is nominated / appointed to conduct detailed investigation.

“Ombudsperson” will be the Chairman, Audit Committee for the purpose of receiving all complaints under this Policy and ensuring appropriate action.

### 4. The Guiding Principles

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

- Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for doing so;
- Treat victimization as a serious matter including initiating disciplinary action on such person/(s);
- Ensure complete confidentiality.
- Not attempt to conceal evidence of the Protected Disclosure;
- Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made;
- Provide an opportunity of being heard to the persons involved especially to the Subject;

### 5. Coverage of Policy

The Policy covers malpractices and events which have taken place/ suspected to take place involving:

- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records

