

|| Shree Ganeshaya Namah||

# NANDINI TEXCOM (INDIA) LIMITED

CIN: L65910GJ1994PLC021165

Reg. Office: B-304, International Commerce Center, Near Kadiwala School, Ring Road, Surat-395002.

Tel:0261-4004596; Email: nandinitexcom@hotmail.com; website: nandinitex.com

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## 1. Objective

This Policy provides a mechanism for directors, employees and other stakeholders to report genuine concerns about unethical behaviour, actual or suspected fraud, or violation of the Company's Code of Conduct or Ethics Policy, without fear of victimisation or unfair treatment.

The purpose of the Whistle Blower Policy of company is to promote the highest ethical standards that facilitate the reporting of potential violations of Company policies and applicable laws. Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (the "Policy" or the "Whistleblower Policy").

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'Whistle Blower' means any person who makes a Protected Disclosure under this Policy.

- 'Protected Disclosure' means any written communication made in good faith disclosing or demonstrating information that may evidence an Improper Activity.
- 'Improper Activity' includes financial fraud, corruption, bribery, misuse of Company resources, violation of applicable laws, or any other unethical conduct.
- 'Audit Committee' means the Audit Committee of the Board.

## 2. Scope

This Policy applies to all directors, employees (permanent, contractual, and temporary), vendors, suppliers, and other persons associated with the Company.

## 3. Reporting Mechanism

Concerns may be reported through any of the following channels:

1. Email to the Chairperson of the Audit Committee: nandinitexcom@hotmail.com Written letter addressed to the Chairperson, Audit Committee, at the Registered Office of the Company.

All complaints shall be addressed to the Audit Committee. In exceptional cases, where the complaint involves the Chairman of the Audit Committee, it shall be directly reported to the Board Chairperson.

## 4. Investigation

- All Protected Disclosures shall be dealt with by the Audit Committee or such person as it may designate.

- The investigation shall be completed within 60 days of receipt of complaint; this may be extended at the discretion of the Audit Committee.
  - The identity of the Whistle Blower shall be kept confidential to the extent possible.
  - The Whistle Blower shall not be entitled to be present during the investigation except as determined by the Audit Committee.
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## **5. Protection to Whistle Blower**

- No director or employee shall take adverse action or victimise any Whistle Blower on account of a Protected Disclosure made in good faith.
  - Adverse action includes dismissal, suspension, demotion, coercion, harassment, or discrimination.
  - Any person who victimises a Whistle Blower shall be subject to disciplinary action.
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## **6. Safeguards Against Misuse**

- This Policy shall not be used as a tool to settle personal scores or to make false or malicious allegations.
  - Whistle Blowers found to have made false complaints knowingly may be subject to disciplinary action.
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## **7. Confidentiality**

All information relating to the complaint and investigation shall be treated as confidential and shall not be disclosed except as required by law or for the purpose of investigation.

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## **8. Disclosure**

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

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## **9. Retention**

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.