

R.P.P INFRA PROJECTS LIMITED

POLICY ON WHISTLE BLOWER/VIGIL MECHANISM

Introduction:

We **R.P.P Infra Projects Limited** a Company registered under Companies Act, 1956 and functioning under Companies Act, 2013 has implemented the said policy by Board of Directors.

Vigil Mechanism for Directors and Employees to report concerns about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct or ethics policy.

The vigil mechanism shall provide for adequate safeguards against victimisation of persons who use such mechanism and make provision for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases.

Reporting:

The Protected Disclosure should be submitted in a closed and secured envelope and should be super scribed as "Protected Disclosure under the Whistle Blower Policy". If the complaint is not super scribed and closed as mentioned above it will not be possible for the Audit Committee to protect the complainant and the protected disclosure will be dealt with as if a normal disclosure. In order to protect identity of the complainant, the special officer will not issue any acknowledgement to the complainant and the complainants are advised neither to write the name / address of the complainant on the envelope nor to enter into any further correspondence with the special officer / audit committee. The audit committee assures that in case any further clarification is required he will get in touch with the complainant.

All protected Disclosures should be addressed to the Special Officer of the Company. The contact details of the Special officer is as under:-

Address of Special Officer:

Mrs. A. Nithya
Whole Time Director
R.P.P Infra Projects Limited
SF.No.454, Raghupathynaikenpalayam,

Poondurai Road, Erode - 638002.
E-mail : nithi.jmd@gmail.com

Protected Disclosures against the Special Officer should be addressed to the Chairman and Managing Director of the Company and the Protected Disclosure against the CMD should be addressed to the Chairman of the Audit Committee. The Contact details of the CMD and the Chairman of the Audit Committee are as under:

Name of CMD:

Mr. P. Arulsundaram

Name of the Audit Committee Chairman:

Mr. K. Rangasamy

Address for communication:

R.P.P Infra Projects Limited
SF.No.454, Raghupathynaikenpalayam,
Poondurai Road, Erode - 638002.

Investigation:

- ❖ All protected disclosures under this policy will be recorded and thoroughly investigated. The Audit Committee (AC) may investigate and may at its discretion consider involving any other Officer of the Company including Vigilance and Security Officer of the Company for the purpose of investigation.
- ❖ The decision to conduct an investigation taken by the AC is by itself not an accusation and is to be treated as a neutral fact finding process.
- ❖ Subject(s) will normally be informed in writing of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- ❖ Subject(s) shall have a duty to co-operate with the AC or any of the Officers appointed by it in this regard to the extent that such cooperation will not compromise self incrimination protections available under the applicable laws.
- ❖ Subject(s) have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with and witness shall not be influenced, coached, threatened or intimidated by the subject(s).
- ❖ Unless there are compelling reasons not to do so, subject(s) will be given the opportunity to respond to material findings contained in the investigation report. No allegation of wrong

doing against a subject(s) shall be considered as maintainable unless there is good evidence in support of the allegation.

- ❖ Subject(s) have a right to be informed of the outcome of the investigations.
- ❖ The investigation shall be completed normally within 30 days of the receipt of the protected disclosure and is extendable by such period as the AC deems fit and as applicable.

Decision and Reporting:

The Chairman of the Audit Committee is taking a final decision about any fraud, unethical behaviour and misuses and he should recommend to the Management for taking disciplinary or corrective action against all violations or any problem arises in the company.

Secrecy:

Persons who connected in this policy should keep the secrecy of all matters which includes any document relating to paper and electronic communication.

Retention of Documents:

All documents will be connected in this policy such as complaints, investigation report and final decision should be kept in the custody of the special officer for a period of five years.

Review and Amendments:

The policy to be reviewed annually and make certain amendments from time to time, if required.