

EDVENSWA ENTERPRISES LIMITED

Establishment of Vigil Mechanism:

Every Listed company is required to establish the vigil mechanism for their Directors and employees to report their genuine concerns or grievances under the Companies Act 2013 and rules, notifications thereon.

- 1) The audit committee shall oversee the Vigil Mechanism and if there is any conflict of interest in a given case the other committee would come to rescue and would deal with the matter.
- 2) In respect of all other Protected Disclosure, those concerning the employees should be addressed to the chairman of the Audit committee of the company and those concerning all other employees should be addressed to the authorised officer at the registered office of the company.
- 3) The Vigil mechanism shall provide for adequate safeguards against victimization of employees.

Procedure:

- 1) All the protected disclosures should be reported in writing by the complainant as soon as possible after the whistle Blower becomes aware of the same as to ensure a clear understanding of issues raised.
- 2) 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”. Alternatively the same can be sent through email with the subject “protected disclosure under the whistle blower policy”.
- 3) Anonymous reports shall not be considered for further action.
- 4) The compliance officer will nominate an investigating officer who will conduct investigations directly through a team formed by the compliance officer depending on the nature of concern.
- 5) On receipt of investigation report the compliance officer will submit report to audit committee who will take a decision on the action to be initiated regarding the concern raised.

- 6) The company shall maintain confidentiality in the investigation procedures and the reports are disclosed only to the employees who have to know the purpose of investigation.
- 7) The Investigations will normally completed within 90 days, the audit committee may extend the period if it deems fit as applicable.
- 8) An employee will not be penalized for raising concern in good faith and believing it to be true .However action will be taken in case he / she files a false report.
- 9) If an employee believes that he/she been retaliated against in the form of adverse action for having raised a concern he/she can raise to the chairman of the Audit committee through compliance officer.
- 10) An adverse action report refers to any action that materially affects the employees which includes demotion, denial of promotion threats to terminate, harassment etc.

The company has the liberty to modify the policy from time to time to maintain compliance with local, state, central and federal regulations and /or to accommodate with the organisational changes within the company.