



# Shree Steel Wire Ropes Limited

## ***VIGIL MECHANISM / WHISTLE BLOWER POLICY***

### VERSION CONTROL

Version	Date of Amendment	Change Reference	Owner	Approving Authority
1	May, 2021	Adoption of the policy under SEBI Regulation	Accounts & Secretarial	Board of Directors



## SHREE STEEL WIRE ROPES LIMITED

### VIGIL MECHANISM / WHISTLE BLOWER POLICY

#### 1. PREFACE

**1.1** Shree Steel Wire Ropes Limited being a Listed Company had established a Vigil Mechanism policy.

#### 2. POLICY OBJECTIVES

**2.1** The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. A Vigil mechanism provides a channel to the employees to report to the management concerns about unethical behavior, actual or suspected fraud or violation of the Codes of conduct or policy. The mechanism provides for adequate safeguards against victimization of employees to avail of the mechanism and provide for direct access to the Chairman/ CEO/Chairman of the Audit Committee in exceptional cases.

**2.2** This neither releases employees from their duty of confidentiality in the course of their work nor from raising malicious or unfounded allegations against people in authority and / or colleagues in general.

#### 3. SCOPE OF THE POLICY

##### **3.1 The Policy covers without limitations the followings:-**

The policy applies to all employees of SSWRL and to those who provide services to SSWRL including contractors and consultants working under a contract for service across all regions. This policy also applies to all the Directors of SSWRL whether in India or outside.

The Scope of Policy includes events such as Breach of contract or Breach of employee Code of Conduct or Rules; Criminal offence; Malpractices or Manipulation of company data/records; Financial irregularities, including fraud, or suspected fraud; Pilferation of confidential/propriety information; Misappropriation of company funds/assets; Deliberate violation of law/regulation; Negligence causing danger to public health and safety; Any other unethical, biased, imprudent event on account of which the interest of the Company is affected.



**3.2** Whistle Blowers should not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by Ombudsperson or the Chairman of the Audit Committee or the Investigators.

#### **4. CONFIDENTIALITY**

Company will treat all disclosures in a confidential and sensitive manner. The identity of the individual may be kept confidential provided this does not hinder any investigation. However, there will be occasions where the identity of the individual needs to be revealed. For example, where the individual is required to give a witness statement or give evidence at a formal hearing, where allegations of misconduct or criminal activity are involved.

#### **5. DISQUALIFICATIONS**

a) While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.

b) Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

c) Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be *mala fide* or malicious or Whistle Blowers who make 3 or more Protected Disclosures, which have been subsequently found to be frivolous, baseless or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy.

#### **6. PROCEDURE AND DISPOSAL OF PROTECTED DISCLOSURES**

**6.1** All Protected Disclosures should be reported in writing (through a letter or email) within 30 days from the date Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English.

**6.2** The Protected Disclosure should be submitted in a closed and secured envelope and should be super scribed as "Protected disclosure under the Vigil Mechanism policy". Alternatively, the same can also be sent through email with the subject "Protected disclosure under the Vigil Mechanism policy". The Ombudsperson or Chairman of the Audit Committee will not issue any acknowledgement to the complainants and in case any further clarification is required, he will get in touch with the complainants.

**6.3** All Protected Disclosures should be addressed to the **Ombudsperson** for investigation.



- 6.4** In respect of Protected Disclosures against the **Ombudsperson** and **employees at the levels of Vice Presidents and above** should be addressed to the **Chairman of the Audit Committee** of the Company.
- 6.5** No action will be taken against a whistle blower who raises a concern in good faith, if it is found to be unjustified after investigation. In making a disclosure the individual should take care to ensure the accuracy of the information.
- 6.6** Concerns which are found to have been raised frivolously, mischievously, or maliciously or for personal gain may result in suitable action being taken by the Audit Committee.

**6.7** The contact details of the **Ombudsperson** are as under:-

**Ombudsperson**

**Mr. Anil L. Sajnani**

Shree Steel Wire Ropes Limited 2<sup>nd</sup>  
Floor, Shiv Ashish Commercial  
Complex, Plot No. 10, 19<sup>th</sup> Road,  
Chembur, Mumbai- 400 071  
E-mail: [anil@sswrl.com](mailto:anil@sswrl.com)

The contact details of the **Chairman of the Audit Committee** are as under:-

**Chairman of the Audit Committee** The  
Chairman (Audit Committee) Shree Steel  
Wire Ropes Limited  
2<sup>nd</sup> Floor, Shiv Ashish Commercial  
Complex, Plot No. 10, 19<sup>th</sup> Road,  
Chembur, Mumbai- 400 071  
E-mail: [compliances@sswrl.com](mailto:compliances@sswrl.com)

- 6.8** On receipt of the protected disclosure the Ombudsperson/ Chairman of the Audit
- 6.9** Committee, as the case may be, shall make a record of the Protected Disclosure and also ascertain from the complainant whether he was the person who made the protected disclosure or not. He shall also carry out initial investigation himself and, if deems fit, he can refer the matter to the Investigators for further appropriate investigation and needful action. The record will include: -



- a) Brief facts;
- b) Whether the same Protected Disclosure was raised previously by anyone, and if so, the outcome thereof;
- c) Whether the same Protected Disclosure was raised previously on the same subject;
- d) Details of Action taken by Ombudsperson / Chairman of the Audit Committee for processing the complaint;
- e) Findings of the Investigators;
- f) The recommendations of the Investigators / other action(s).

**6.10** The Investigators, if deems fit, may call for further information or particulars from the complainant.

**6.11** All protected disclosures under this policy will be recorded and thoroughly investigated.

## **7. DECISION AND REPORTING**

**7.1** Ombudsperson / Chairman of the Audit Committee along with its recommendations will report its findings to the Chairman/ Managing Director of the company within 45 days of receipt of report for further action as deemed fit. In case prima facie case exists against the subject, then the Chairman/ Managing Director shall forward the said report with its recommendation to the concerned disciplinary authority for further appropriate *Disciplinary Action* in this regard or shall close the matter, for which he shall record the reasons. Copy of above decision shall be addressed to the Audit Committee, the complainant and the subject.

**7.2** A quarterly report with number of complaints received under the Policy and their outcome shall be placed before the Audit Committee and the Board.

## **8. AMENDMENT**

The Managing Director / Chairman of the Company have the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever. However, no such amendment or modification will be binding on the Employees unless the same is notified to the Employees in Writing.

\*This policy is amended by the Board of Directors in its meeting.