



Vigil Mechanism

(Whistle Blower)

Supertron Electronics Pvt. Ltd.
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1.0 INTRODUCTION

1.1 Vigil Mechanism

Good governance is fundamental to a company's existence. It boosts and secures investors' confidence by demonstrating the company's commitment to achieving higher goals and profits. This is accomplished through transparent procedures and practices, effective mechanisms to address stakeholders' concerns, keeping shareholders informed about company developments, and ensuring effective control over the company's affairs.

Supertron Electronics Pvt. Ltd. is committed to maintaining high standards of honesty, integrity, and ethical behavior. To strengthen this commitment, the Company has instituted a **Vigil Mechanism / Whistle-blower Policy**. This Policy provides a framework for directors, employees, and other stakeholders to report genuine concerns about any unethical behavior, actual or suspected fraud, or violation of the Company's code of conduct.

1.2 Objective:

The objective of this Policy is to:

- Ensure that concerns are raised and addressed appropriately.
- Provide a secure environment for individuals to report issues without fear of retaliation.
- Protect individuals who report concerns in good faith.
- Investigate concerns raised under this Policy thoroughly and impartially.
- Implement corrective actions where necessary.

1.3 Date of Implementation:

This Vigil Mechanism comes into force from 1 August 2024

2. SCOPE

1.2 Applies to whom?

This Vigil Mechanism Framework is applicable to every Director and employee of Supertron Electronics Pvt. Ltd & its subsidiaries in and outside India. It includes both permanent and contract employees, whether they are working in India or abroad, on deputation or otherwise.

1.3 Acts of Wrongdoings may include acts as illustrated below but not necessarily be limited to the same

- Forgery or alteration of documents
- Violations of the Code of Conduct
- Unauthorized alteration or manipulation of computer files & Data
- Fraudulent financial reporting
- Questionable accounting, internal accounting controls or auditing matters
- Pursuit of a benefit or advantage in violation of the company's interest
- Misappropriation/misuse of Company's resources, like funds, supplies, or other assets
- Authorizing/receiving compensation for goods not received/services not performed

- Improper use of authority
- Release of Proprietary Information
- Theft of Cash/Assets
- Theft of Goods/Services
- Unauthorized Discounts/approvals/sanctions
- Falsification/Destruction of Company Records
- Fraudulent Insurance Claims
- Disclosure of confidential information
- Work Place Harassment
- Sexual Harassment

Any other activity by an Employee/Director that is undertaken in the performance of the Employee’s official duties, whether or not that action is within the scope of his or her duties, and which is in violation of any national or international law including statutory/ regulatory rules and regulations.

1.4 Matters pertaining to the following may be excluded from the purview of Vigil Mechanism Framework.

- Personal Grievances
- Dissatisfaction with appraisals and rewards
- Company Policies

3.0 Role of Vigil Committee:

3.1 Reporting Concerned:

Concerns can be reported in writing in paper or via email to the designated authority. No verbal or WhatsApp/ Message will be consider. The contact details for reporting concerns are as follows:

| Designated Authority | Email I'D |
|----------------------|--|
| Nirmal K. Meharia | meharia@supertronindia.com |
| Kankan Bera | kankan@supertronindia.com |

3.2 Responsibilities of Vigil Committee

- Receiving and acknowledging complaints
- Interim communication to Audit Committee/Director
- Recommend course of action based on investigation to management
- Prevention and redressal of Vigilant Person/Whistleblower/Tipster harassment
- Any other related responsibility as decided by the management
- The decision on the course of action on the whistleblower's complaint as taken by the Committee will be final

4.0 PROCEDURE:

4.1 How to Report:

A perceived wrongdoing or an act for whistle blowing may be reported by a **Vigilant Person/Whistleblower/Tipster** in oral and then in written form.

- In the case of oral reports, the **Vigilant Person/Whistleblower/Tipster** may approach his immediate superior or the Departmental Head who should get the oral report converted into a written one. The written report should then be forwarded to the Vigil Committee.
- Disclosures should be factual and not speculative, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.
- Disclosures should be addressed to the Vigil Committee and those concerning the members of Vigil Committee or Disclosures by Directors should be addressed to the Chairman of the Audit Committee/Board.
- Upon receipt of the report from a whistleblower, Vigil Committee /Chairman of the Audit Committee/Board will acknowledge the same and will review and may deal with the complaint, in the manner as it deems necessary.
- Anonymous letters will not be considered.

5.0 PROTECTION OF VIGILANT PERSON/WHISTLEBLOWER/TIPSTER

5.1 Protection against Retaliation:

The Company assures that no Whistle-blower will suffer retaliation, harassment, or adverse employment consequences for reporting concerns in good faith. Any attempt to retaliate against a Whistle-blower will be treated as a serious violation of this Policy and will result in disciplinary action.

5.2 Confidentiality:

All reports under this Policy will be treated in a confidential manner. The identity of the Whistle-blower will be kept confidential unless required by law or for the purposes of an investigation.

5.3 Investigation:

- Upon receipt of a complaint, the designated authority will acknowledge receipt and proceed with a preliminary review.
- If the preliminary review indicates that the concern has merit, a detailed investigation will be conducted.
- The investigation will be carried out in a fair and unbiased manner, ensuring that all relevant facts are considered.
- The findings of the investigation will be documented and communicated to the appropriate stakeholders.
- The investigation will be conducted impartially, without any regard to gender, position, caste, age, or other personal attributes. All individuals involved will be treated equally and with the utmost respect.

5.4 Disciplinary Actions:

If the investigation finds that there has been a violation of the Company's code of conduct or any other wrongful act, appropriate disciplinary action will be taken against the responsible individual(s). The disciplinary action may include termination of employment or any other action deemed appropriate by the Company.

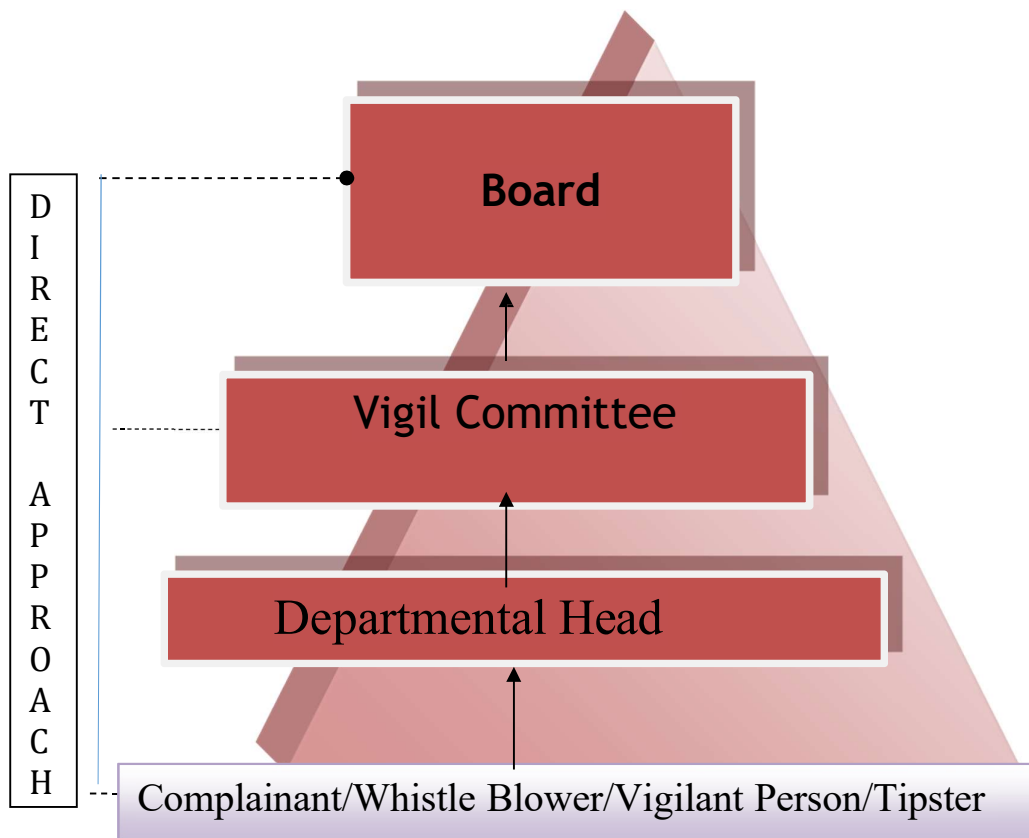
5.5 Retention of Documents:

All documents related to the reporting, investigation, and resolution of complaints under this Policy will be retained for a minimum period of seven years of the company.

6.0 Review & Amendment

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant legislation and remains effective. The Board shall have the right to change/amend the policy at any time at its discretion and the amendments shall be notified to the employees.

HIERARCHICAL STRUCTURE OF VIGIL MECHANISM



Contact Information

For any questions or concerns regarding this Policy, please contact:

- **Designated Authority:** Head Human Resource
- **Email:** kankan@supertronindia.com
- **Address:** Supertron, Head Office, Kolkata, India.