

Summary of Swastik Vigil Mechanism

Swastik has implemented a Vigil Mechanism across the organization in compliance with the requirements of section 177(9) & (10) of the Companies Act, 2013 and Clause 49(II)(F) of the Listing Agreement.

Following is a summary, highlighting the features of the Whistle Blower Policy that comprises the Vigil Mechanism.

1. Under the Whistle Blower Policy ('the Policy'), Employees and Directors of the Company can report genuine concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct & Ethics, without fear of punishment for such disclosure or unfair treatment to the Chairman of Audit Committee.
2. The Policy covers all malpractices and all unethical, illegal or improper activities including but not limited to the following matters:
 - a. Abuse of authority
 - b. Negligence causing substantial and specific danger to public health and safety
 - c. Financial irregularities including fraud or suspected fraud
 - d. Criminal offence
 - e. Pilferation of confidential / proprietary information
 - f. Misappropriation of company funds / property
 - g. Breach of Code of Conduct & Ethics Policy
 - h. Sexual Harassment
 - i. Any other unethical or immoral or illegal events
3. The Policy provides for protection of whistle blowers against unfair treatment.
4. Investigations shall be carried out in an unbiased manner.
5. The Policy contains provisions for disciplinary action against malafide or malicious complaints.
