



Creative Carve Pvt. Ltd.

308 & 309 Sector No. 7, PCNTDA, Bhosari, Pune - 411 026

Tel No. +91 20 66329727/66329709

Email : info@creativecarve.com

CIN: U29299PN1984PTC184738

CREATIVE CARVE PRIVATE LIMITED

POLICY ON VIGIL MECHANISM/ WHISTLE BLOWER POLICY

INDEX

SR NO	PARTICULARS	PAGE NO'S
01.	Preface	2
02.	Definition	2
03.	Objective of Policy	2
04.	Scope of Policy	2
05.	Reporting of Protected Disclosure	3
06.	Receipt, Investigation and Disposal of Protected Disclosures	4
07.	Protection	5
08.	Retention of Documents	5
09.	Amendment to this Policy	5



Creative Carve Pvt. Ltd.

308 & 309 Sector No. 7, PCNTDA, Bhosari, Pune - 411 026

Tel No. +91 20 66329727/66329709

Email : info@creativecarve.com

CIN: U29299PN1984PTC184738

1. PREFACE:

CREATIVE CARVE PRIVATE LIMITED (hereinafter referred to as CCPL), being a private limited company needs to establish the vigil mechanism for directors and employees to report the genuine concerns as per the provisions of section 177 of the Companies Act, 2013.

CCPL has adopted a Code of Conduct ("the Code") for directors, senior management, & personnel which lays down the principles and standards that should govern the action of the Company and its employees.

In view of the above, CCPL, being a private company, has established a Vigil Mechanism and formulated a Whistle Blower Policy for CCPL.

2. DEFINITION:

"Board" means the Board of Directors of the Company.

"Personnel" means all the present employees, workers, contract employees of the Company including Directors for the purpose of this Policy.

"Protected Disclosure/Compliant" means any communication in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

"Whistle Blower/Complainant" is an Employee or group of Employees who make a Protected Disclosure under this Policy.

"Subject/Defendant" means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

"Vigilance and Ethics Officer" means the Chief Internal officer/director of the Company for the purpose of receiving Protected Disclosures from Whistle Blowers, maintaining records thereof, placing the same before the Audit Committee for its disposal and informing the Whistle Blower the result thereof.

3. OBJECTIVE OF POLICY:

The purpose and objective of this Policy is to provide a framework to promote responsible and secure whistle blowing. It protects the personnel wishing to raise concern about serious irregularities within the Company. 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 personnel 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 personnel and Directors to report to the management concerns about unethical behavior, actual or suspected fraud or violation of codes of conduct or policy. The mechanism provides adequate safeguards against victimization of personnel and Directors to avail of the mechanism.

4. SCOPE OF POLICY:

The Policy covers malpractices and events which have taken place/ suspected to have taken place misuse or abuse of authority, fraud or suspected fraud, violation of Company rules, manipulation, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of



Creative Carve Pvt. Ltd.

308 & 309 Sector No. 7, PCNTDA, Bhosari, Pune - 411 026

Tel No. +91 20 66329727/66329709

Email : info@creativecarve.com

CIN: U29299PN1984PTC184738

which the interest of the Company is affected. This Policy applies to all personnel, regardless of their location. Violations will result in appropriate disciplinary action.

5. REPORTING OF PROTECTED DISCLOSURE:

All personnel are eligible to make protected disclosures under the policy in relation to matters concerning the company.

The Company does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing. This Policy ensures that employees are empowered to pro-actively bring to light such instances without fear of reprisal, discrimination or adverse employment consequences.

This Policy is not, however, intended to question financial or business decisions taken by the Company & shall not be used:

- i. For raising grievances related to Employees' own career / other personal grievances.
- ii. For raising grievances related to career of other Employees / colleagues.
- iii. Grievances arising out of the policies / procedures of the Company and any decision taken by the superior / management in this respect.
- iv. Grievances related to such other similar issues like i, ii and iii herein-above.

All Protected Disclosures should be reported in writing by the Whistle Blower as soon as possible after whistle Blower becomes aware of the same to ensure a clear understanding of the issues raised.

All Protected Disclosures should be addressed to the Mr. Vikramaditya Pawankumar Saraf Vigilance and Ethics Officer/Authorized Director of the Company or to the Chairman of the company in exceptional cases by sending an email on info@creativecarve.com with the subject "Protected Disclosure under the Whistle Blower Policy".

However, employees can lodge a Protected Disclosure anonymously without disclosing the identity. A Protected Disclosure received anonymously will be evaluated for investigation. In exercising this discretion, the following factors will be taken into consideration:

- i. The seriousness of the issue raised;
- ii. The creditability of the concern; and
- iii. The likelihood of confirming the allegations from attributable sources.

While this Policy is intended to protect genuine Whistle Blowers from any unfair treatment because of their disclosure, misuse of this protection by making frivolous and bogus complaints with mala fide intentions is strictly prohibited. A personnel who makes Protected Disclosure with mala fide intentions and which is subsequently found to be false will be subject to strict disciplinary action.

The Whistle Blower is not required to furnish any more information than what he/she wishes to disclose, but to process the request the basic details as below shall be provided:

- i. The personnel, and/or outside party or parties involved;
- ii. The sector of the Company where it happened (Location, Department, office);
- iii. When did it happen: a date or a period or time;



Creative Carve Pvt. Ltd.

308 & 309 Sector No. 7, PCNTDA, Bhosari, Pune - 411 026

Tel No. +91 20 66329727/66329709

Email : info@creativecarve.com

CIN: U29299PN1984PTC184738

- v. Type of concern (what happened);
 - a. Financial reporting;
 - b. Legal matters;
 - c. Management action;
 - d. Employee misconduct; and/or

6. RECEIPT, INVESTIGATION AND DISPOSAL OF PROTECTED DISCLOSURES

A. RECEIPT:

The company, after the receipt of complaint under vigil mechanism, shall take a declaration from the complainant and shall carry out initial investigation either themselves or by involving any other officer of the Company.

Company for further appropriate investigation and needful action, shall maintain a record which includes:

- a. Brief facts;
- b. Whether the same Protected Disclosure was raised previously by anyone on the subject, and if so, the outcome thereof;
- c. Details of actions taken by the authorized person or any other officer.
- d. Findings and recommendations.

B. INVESTIGATION:

- i. The Subject will normally be informed in writing of the allegations at the outset of a formal investigation and have opportunities for providing their input during the investigation.
- ii. The Subject shall fully co-operate with the Vigilance and Ethics Officer /authorized director/ person in the investigation. If he fails, will be subject to strict disciplinary action.
- iii. The Subject shall not withhold, destroy or tamper any evidence and shall not be influence, threatened or intimidate any witness.
- iv. The investigation shall be completed normally within 90 (ninety) days of the receipt of the protected Disclosure, and this period is extendable by such period as chairman deems fit.
- v. All information disclosed during the investigation will remain confidential, except as necessary or appropriate to conduct the investigation and take any remedial action, in accordance with any applicable laws and regulations.

C. DISPOSAL:

If an investigation leads the Vigilance and Ethics Officer / the Chairman of the company to conclude that an improper or unethical act has been committed, the Company shall take such disciplinary or corrective action commensurate with the severity of the offence, as it may deem fit. The Company may also take reasonable and necessary measures to prevent any further violations which may have resulted in a Protected Disclosure being made.



Creative Carve Pvt. Ltd.

308 & 309 Sector No. 7, PCNTDA, Bhosari, Pune - 411 026

Tel No. +91 20 66329727/66329709

Email : info@creativecarve.com

CIN: U29299PN1984PTC184738

The rules/regulations/ policy made after that incident shall be binding on all employees/staff/workers etc

A Complainant who makes false allegations of unethical and improper practices or about alleged wrongful conduct of the defendant to the authorized director/Chairman of the company shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

7. PROTECTION:

The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. The identity of the complainant will not be revealed unless he himself has made either his details public or disclosed his identity to any other office or authority.

Accordingly, the Company prohibits discrimination, retaliation or harassment of any kind against a Whistle Blower, who based on his/her reasonable belief that one or more Protected Disclosure has occurred or are, occurring, reports that information. Any personnel, who retaliates against a Whistle Blower who has raised a Protected Disclosure in good faith, will be subject to strict disciplinary action up to and including immediate termination of employment or termination of his/her relationship with the Company.

8. RETENTION OF DOCUMENTS:

All such documentation shall be retained by the company for a minimum of five (5) years or such other period as specified by any other law in force, whichever is more, from the date of receipt of the complaint. Confidentiality will be maintained to the extent reasonably practicable depending on the requirements and nature of the investigation, as indicated above. The documentation shall include any written submissions provided by the complainant, a summary of the date and way the complaint was received and any response to the complainant.

9. AMENDMENT TO THIS POLICY:

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. Modification may be necessary, among other reasons, to maintain compliance with local, state, central and federal regulations and/or accommodate organizational changes within the Company. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them in writing.