

SHAPOORJI PALLONJI PANDOH TAKOLI HIGHWAY PRIVATE LIMITED

VIGIL MECHANISM POLICY

1. POLICY OBJECTIVES

- To provide a mechanism to Directors and Employees of the Company to report genuine concerns about any unethical, improper practices or any wrongful conduct they observe in the Company.
- The Vigil Mechanism aims to provide a channel to the Directors and Employees to report genuine concerns about unethical behaviour, actual or suspected fraud or violation of policy.
- The mechanism provides for adequate safeguards against victimization of directors and employees to avail of the mechanism.

2. DEFINITIONS

- “**Protected Disclosure**” means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- “**Whistle Blower**” means an employee and/or a Director making a Protected Disclosure under this policy.
- **Vigilance Officer** is a person nominated/appointed to receive Protected Disclosures from Whistle Blower, maintaining records thereof, placing the same before the Board of Directors of the Company for its disposal and informing the Whistle Blower the result thereof.

3. ELIGIBILITY

All Directors and Employees of the Company are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company.

4. POLICY & PROCEDURES

- Any Whistle Blower may report on any unethical or wrongful practices or conduct they have observed in the Company. All Protected Disclosures should be reported in writing by the Whistle Blower as soon as possible.
- The Whistle Blower’s role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.
- It will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment or victimisation. Any abuse of this protection will warrant disciplinary action.

- Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be malafide 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 subject to disciplinary/other action.
- Appropriate care will be taken to keep the identity of the Whistle Blower confidential.
- Protected Disclosure should preferably be reported, in writing, so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower.
- All Protected Disclosures should be addressed to the Vigilance Officer.
- The contact details of the Vigilance Officer are as under:-
Mr. Sanjay Date, Director
Shapoorji Pallonji Pandoh Takoli Highway Private Limited
SP Centre, 41/44 Minoo Desai Marg, Colaba, Mumbai 400 005.
Email - vigilanceofficer.infra@shapoorji.com

The Board of Directors of the Company shall oversee the implementation of this policy.

Any Director of the Company or other officer having any conflict of interest with the matter shall disclose his / her concern/interest forthwith and shall not deal with the matter / investigation process.

For Shapoorji Pallonji Pandoh Takoli Highway Private Limited

AS

Anandnarayanan Sundaresan
Director
DIN - 07654927

Sanjay Date

Sanjay Date
Director
DIN – 06934651



Shapoorji Pallonji Pandoh Takoli Highway Private Limited

Corporate Identification No U45201MH2017PTC297357

Regd. Office: SP Centre, 41/44, Minoo Desai Marg, Colaba, Mumbai 400005 India

(T) +91 22 67490000 (F) +91 22 67490017 website www.sp-group.co.in



INFRA