



Creative Stylo Packs Private Limited

WHISTLE BLOWER POLICY / VIGIL MECHANISM

Section 177 of the Companies Act, 2013 requires every listed Company and such class or classes of Companies, as may be prescribed to establish for the Directors and Employees to report the genuine concerns in such manner as may be prescribed.

The Board of Directors of Creative Stylo Packs Private Limited ("Company") have adopted the Whistle Blower Policy in its meeting held on 30 March 2021, so that the employees of the company have a secure mechanism to report any concerns that they may have of actual, suspected or planned wrongdoings (hereinafter "wrongdoings") involving an Company or any of its directors, officers or employees.

The employees of the company have a right to report any such concerns through this policy, knowing fully well that such an act of whistle blowing on his / her part would not lead to any discrimination or recrimination against him / her.

The Chairperson of the Audit Committee shall be the persons to whom such concerns can be addressed. Correspondence on this may be addressed to them at the address of the Registered Office at 205,R.C Church Compound, Dr. Ambedkar Road, Dadar. Mumbai - 400014, or by email to Sec.csppl@gmail.com (Chairperson of the Audit Committee).

DEFINITIONS

The definitions of some of the key terms used in this policy are given below

"Whistle Blower" - The Directors/employees of the Company making the disclosure under this policy. The Whistle Blower's role is that of a reporting party. Whistleblowers are not investigators or finders of the facts; neither can they determine the appropriate corrective or remedial action that may be warranted.

"Vigilance Officer/ Ombudsperson" is a person including a full time senior Employee, well respected for his/her integrity, independence and fairness. He/she would be authorised by the Board of the Company for the purpose of receiving all 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.

The name of the Vigilance Officer / Ombudsperson / Whistle Officer will be circulated to the Directors and employees of the Company.

"Directors/ Employees" - all Directors and Employees of the Company.

"Protected Disclosure" means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

"Audit Committee" - constituted under section 177 of the Companies Act 2013.

"Subject" 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.

"Committee" means an officer or Committee of persons who is nominated/appointed to conduct detailed investigation.

SCOPE OF POLICY

The policy applies to all the units of the Companies in India. The policy applies regardless of the jurisdiction in which the Wrongdoing occurs or is suspected to have occurred, or whether or not such Wrongdoing or suspected Wrongdoing occurs in the home country or jurisdiction of another Country.

PROTECTION OF WHISTLEBLOWER

Any employee of the Company making a report in good faith, can do so in the knowledge and confidence that the Board of Directors of Company will ensure that the act will not lead to the employee facing any recrimination, punishment or victimization.

Reports made in good faith must be based on a reasonable belief that a Wrongdoing has occurred or is likely to occur. If a subsequent investigation reveals that there was no Wrongdoing the employee making the report would not be subjected to any victimization or disciplinary action if he/she had acted in good faith.

DISQUALIFICATION FROM PROTECTION

Protection under the scheme would not mean protection from departmental action arising out of false or bogus disclosure made with mala tide intention or complaints made to settle personal grievance.

Whistle Blowers, who make any disclosures, which have been subsequently found to be mala tide or frivolous or malicious shall be liable to be prosecuted and appropriate disciplinary action will be taken against them under service rules/ bipartite settlements only when it is established that the complaint has been made with the intention of malice.

This policy does not protect a Director/ employee from an adverse action which occurs independent of his disclosure under this policy or for alleged wrongful conduct, poor job performance or any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy.

WRONGDOING FOR WHISTLE BLOWING PURPOSES INCLUDES THE FOLLOWING

- Criminal activities;
- Fraud, forgery or defalcation
- Bribery or corruption
- Provision of misleading information or the falsification of financial or other records;
- Breaches of copyright, patents and licences;
- Violation of environmental legislation;

- Violation of restraint of trade legislation;
- Failure to comply with other legal obligations
- Violation of the Code of Conduct;
- Violations of human rights, of child rights, use of child labour, workplace harassment, unfair treatment of employees;
- Falsification of statutory reports and records, including the company's financial statements and accounting records;
- Breaches of other policies and procedures (including, without limitation, breaches of financial controls and reporting requirements) and Concealing or overlooking any of the above

Policy should not be used in place of the Company's grievance procedures or be a route for raising malicious or unfounded allegations against colleagues

This is an illustrative list and employees can report other concerns.

REPORTING MECHANISM/ COMPLAINANT (WHISTLEBLOWER)

Any Director/ employee willing to disclose information may do so in any of the following manner:

- In writing, duly addressed to the Ombudsperson in sealed envelope specifically Subscribed as "Disclosure under Whistle Blower Scheme".
- Suitable proof of his/her identity/ contact numbers/ address so that additional information, if any, can be obtained. In case identity cannot be ensured, the complaints will be treated as anonymous/ pseudonymous complaints, and may not attract further action.
- Complaints can also be sent to the Ombudsperson from the official e-mail ID of the Director/ employee. The contact details/ address of the Director/employee should however be provided. In case of absence/ incorrectness of the same, the complaints will be treated as anonymous/ pseudonymous complaints and may not attract further action.
- Disclosure can also be made to Ombudsperson over Telephone. The Whistle Blower would however, be required to disclose his/her identity and furnish sufficient information for verifying his/her identity by the Ombudsperson. Additional information, as deemed necessary, will be sought by the Ombudsperson receiving the call.
- The disclosure whether by letter/email/telephone should provide specific and verifiable information in respect of the "Subject – Corporate office/ Branch/ Director/ Employee
- The details in the complaint should be specific and verifiable.

MECHANISM FOR ACTION/ REPORTING ON SUCH DISCLOSURES

The Ombudsperson shall, on receipt of the complaint, arrange to verify the identity of the whistle Blower.

Proper record will be kept of all disclosures received. The action against each disclosure will be also noted and put up to the Whistle Officer within 07 days from the receipt of complaint.

Only on being satisfied that the disclosure has verifiable information, necessary enquiry/ investigation will be done with regard to the complaint with assistance of the Committee at

Registered office. Ombudsperson will also have the authority to seek the assistance / support from other departments. The process will be completed within 30 days of receipt of the complaint.

Any inquiry/ investigation conducted against any subject shall not be construed by itself as an act of accusation and shall be carried out as neutral fact finding process, without presumption of any guilt.

he inquiry/ investigation shall be conducted in a fair manner and provide adequate opportunity for hearing to the affected party and a written report of the findings should be prepared for submission.

A time frame of maximum 30 days will be permitted to complete the investigation/ enquiry. In case the same cannot be completed within stipulated period, interim report should be submitted by the Investigators giving inter alia, the tentative date of completion.

In case the disclosure made does not have any specific & verifiable information, the Ombudsperson will be authorized not to take any action. This would be suitably recorded and placed before the Whistle Officer.

In case the allegations made in the disclosure are substantiated, appropriate departmental action will be taken against the employee concerned on whose part lapses are observed.

The action taken against the subject/ Director/ employee as stated in the above paragraph will be in addition to any other action or prosecution which may be initiated against said subject/ Director/ employee under any statute or law in force.

REVIEW OF STATUS REPORT

Status Report (including NIL report) may be put up by the Ombudsperson to the Audit Committee of the Directors of the Company.

ACCESS TO CHAIRPERSON OF THE AUDIT COMMITTEE

The Whistle Blower shall have right to access Chairperson of the Audit Committee directly in exceptional cases and the Chairperson of the Audit Committee is authorized to prescribe suitable directions in this regard

AMENDMENTS

The Board of Directors of the Company may modify this Policy. Modification may be necessary, among other reasons, to maintain compliance with local, state and central regulations and / or to accommodate organizational changes within the Company.