



AMCO
AMCO INDIA LTD.

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Manufacturers of PVC Films & Sheetings

WHISTLE BLOWER /VIGIL MECHANISM POLICY

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For AMCO INDIA LTD.
Rajiv Gupta
Director



AN ISO 9001 : 2008 COMPANY

1. PREFACE:

- i. The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior.
- ii. Section 177 (9) of the Companies Act, 2013 mandates the following classes of companies to constitute a vigil mechanism –
 - a. Every listed company;
 - b. Every other company which accepts deposits from the public;
 - c. Every company which has borrowed money from banks and public financial Institutions in excess of Rs. 50 Crores.

Further, Clause 49 of the Listing Agreement between listed companies and the Stock Exchanges has been recently amended which, *inter alia*, provides for a mandatory requirement for all listed companies to establish a mechanism called the 'Whistleblower Policy' for directors and employees to report concerns of unethical behaviour, actual or suspected, fraud or violation of the Company's code of conduct or ethics policy.

- iii. The Purpose of this Policy is to encourage its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. A Vigil (Whistle Blower) mechanism provides a channel to the employees and Directors to report to the management concerns about unethical behavior, actual or suspected fraud or violation of the Codes of conduct or policy. The mechanism provides for adequate safeguards against victimization of employees and Directors to avail of the mechanism and also provide for direct access to the Chairman/ MD/ Chairman of the Audit Committee in exceptional cases.
- iv. This neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations against people in authority and / or colleagues in general.

2. DEFINITIONS:

- i. "Company" means Amco India Limited and all its Offices.
- ii. "Audit Committee" means the Audit Committee of the Board constituted by the Board of Directors of Company in accordance with provisions of Section 177 of Companies Act, 2013 read with Clause 49 of Listing Agreement entered into by the Company with Stock Exchanges.
- iii. "Improper Activity" means unethical behavior, actual or suspected fraud, embezzlement etc., violation of the Company's general guidelines on conduct, moral turpitude, unlawful conduct etc. by an employee of Company.
- iv. "**Vigilance and Ethics Officer**" means an officer appointed to receive protected disclosures from whistle blowers, maintaining records thereof, placing the same

For AMCO INDIA LTD
Rajesh Gupta
Director

