

**Advance Multitech Limited**  
(CIN: L51494GJ1979PLC006698)

**Vigil Mechanism & Whistle Blower**

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## INTRODUCTION:

Section 177 of the Companies Act, 2013 requires every listed company and such class or classes of companies, as may be prescribed to establish a vigil mechanism for the directors and employees to report genuine concerns in such manner as may be prescribed.

## POLICY FORMULATION

In compliance of the above requirements, Advance Multitech Limited (AML), being a Listed Company has established a Vigil (Whistle Blower) Mechanism and formulated a Policy in order to provide a framework for responsible and secure whistle blowing/vigil mechanism.

## POLICY OBJECTIVES

Advance Multitech Limited (AML) believe in conducting its affairs in fair and transparent manner including in accordance with all applicable laws and regulations.

The Company is committed to develop a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct.

## TERMS OF REFERENCE

In this Policy, the following terms shall have the following meanings:

**“Audit Committee”** means the committee constituted by Advance Multitech Limited (AML) in accordance with Section 177 of the Companies Act, 2013, which has responsibility for supervising the development and implementation of this Policy.

**“Employee”** means any employee or director of Advance Multitech Limited (AML)

**“Vigilance Officer / Vigilance Committee or Committee”** means a person or committee of persons nominated/ appointed to receive protected disclosure from whistle blowers, maintaining records thereof, placing the same before Audit Committee for its disposal and informing the whistle blower the result thereof.

**“Protected Disclosure”** means a written communication of a factual concern made in good faith which discloses or demonstrate information that may evidence unethical or improper activity.

**“Subject”** means a person against or in relation to whom a protected disclosure is made or evidence gathered during the course of an Investigation.

**“Whistle-blower”** means any Employee who makes a Protected Disclosure under this Policy.



## SCOPE AND EXCLUSION

This Vigil Mechanism and Whistle-blower Policy sets out the procedure to be followed while making a disclosure.

This Policy applies to all Employees and directors of the Company and violations will result in appropriate disciplinary action.

## PROCEDURE

All Protected Disclosures should be reported to the Vigilance Officer or to the Chairman of the Audit Committee in exceptional cases in writing by the complainant as soon as possible, not later than 30 days after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English under a covering letter signed by the complainant in a closed and secured envelope and should be super scribed as "Protected disclosure under the Whistle Blower policy" or sent through email with the subject "Protected disclosure under the Whistle Blower policy". If the complaint is not super scribed and closed as mentioned above, the protected disclosure will be dealt with as if a normal disclosure.

The contact details of the Vigilance Officer are as under:-

**Name and Address** –Mr. Pulkit Goenka – Director & CFO  
Advance Multitech Ltd.  
36, Kothari Market,  
Kankaria Road,  
Ahmedabad: 380022  
Email: [info@advancemulti.com](mailto:info@advancemulti.com)  
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In order to protect the identity of the complainant, the Vigilance Officer will not issue any acknowledgement to the complainants and they are not advised neither to write their name / address on the envelope nor enter into any further correspondence with the Vigilance Officer.

Anonymous / Pseudonymous disclosure shall not be entertained by the Vigilance Officer.

On receipt of the protected disclosure the Vigilance Officer shall detach the covering letter bearing the identity of the Whistle Blower and process only the Protected Disclosure.

## INVESTIGATION

All Protected Disclosures under this policy will be recorded and thoroughly investigated.

The Vigilance Officer will carry out an investigation either himself/herself or by involving any other Officer of the Company/ Committee constituted for the same /an outside agency before referring the matter to the Audit Committee of the Company.



The Audit Committee, if deems fit, may call for further information or particulars from the complainant and at its discretion, consider involving any other/additional Officer of the Company and/or Committee and/ or an outside agency for the purpose of investigation.

The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact finding process.

The investigation shall be completed normally within 90 days of the receipt of the protected disclosure and is extendable by such period as the Audit Committee deems fit.

Any member of the Audit Committee 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.

### DECISION AND REPORTING

If an investigation leads to a conclusion that an improper or unethical act has been committed, the Chairman of the Audit Committee shall recommend to the Board of Directors of the Company to take such disciplinary or corrective action as it may deem fit.

Any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

A quarterly report with number of complaints received under the Policy and their outcome shall be placed before the Audit Committee and the Board.

A complainant who makes false allegations of unethical & improper practices or about alleged wrongful conduct of the Subject to the Vigilance Officer or the Audit Committee shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

### CONFIDENTIALITY

The complainant, Vigilance Officer, Members of Audit Committee, the Subject and everybody involved in the process shall, maintain confidentiality of all matters under this Policy, discuss only to the extent or with those persons as required under this policy for completing the process of investigations and keep the papers in safe custody.

### PROTECTION

No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this policy. Adequate safeguards against victimization of complainants shall be provided. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure.

The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.



## DISQUALIFICATIONS

While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.

Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable to be prosecuted.

## ACCESS TO CHAIRMAN OF THE AUDIT COMMITTEE

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

## COMMUNICATION

Directors and Employees shall be informed of the Policy by publishing on the notice board and the website of the Company.

## RETENTION OF DOCUMENTS

All Protected disclosures in writing or documented along with the results of Investigation relating thereto, shall be retained by the Company for a period of 5 (five) years or such other period as specified by any other law in force, whichever is more.

## AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Directors and employees unless the same is not communicated in the manner described as above.

For, Advance Multitech Ltd.

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Arvind Goenka  
Chairman & Managing Director  
DIN 00093200