

REX SEALING & PACKING INDUSTRIES LIMITED

THE WHISTLE BLOWER POLICY

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They set standards for the organization and for employee conduct.

1. Purpose of this policy :-

The purpose of this policy is to articulate the Company's point of view on whistle blowing, the process, and the procedure to strengthen the whistle blowing mechanism at the Company.

This policy:

- Provides a platform and mechanism for the Employees and Directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- It provides an environment that promotes responsible and protected whistle blowing. It reminds Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Values of the Company's Code of Conduct.
- Above all, it is a dynamic source of information about what may be going wrong at various levels within the Company, which will help the Company in realigning various processes and to take corrective actions as part of good governance practice.

2. Coverage of this policy

- This policy is applicable to all the Units including all employees and Directors.
- This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.

3. Who is a whistle blower?

Any Employee, Director or third party who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct.

This whistle blower has come to the decision to make a disclosure or express a genuine concern/grievance/allegation, after a lot of thought.

4. Protection

The process is designed to offer protection to the whistle blower (employees and directors) provided that the disclosure made / concern raised / allegations made ("complaint") by a whistle blower is in good faith and the alleged action or non-action, constitutes a genuine and serious breach of what is laid down in the Values and/ or the Company's Code of Conduct.

The Company affirms that it will not allow any whistle blower to be victimized for making any complaint.

Any kind of victimization of the whistle blower brought to the notice of the Value Standards Committee will be treated as an act warranting disciplinary action and will be treated so.

This is applicable to the Company's operations - Coverage All Employees, Directors and Third parties who may wish to report a concern related to a potential violation of the Company Code of Conduct Responsible portfolio & contact information Organization Effectiveness portfolio at Business Human Resources,

As a Company, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against whistleblowers. Complete protection will be given to whistleblowers against any unfair practices like retaliation, threat or intimidation, termination/suspension of service, disciplinary action, transfer, demotion, refusal of

promotion, or the like, including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

5. Reporting in good faith

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely based on hearsay or rumour. This also means that no action will be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation. However, if a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the Value Standards Committee shall take appropriate disciplinary or legal action against the concerned whistleblower.

6. List of exclusions

The following types of complaints will ordinarily not be considered and taken up:

1. Complaints that are Illegible, if handwritten
2. Complaints that are trivial or frivolous in nature
3. Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
4. Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed
5. Issue raised, relates to service matters or personal grievance (such as increment, promotion, appraisal etc.) or also any customer/product related grievance.

7. Dealing with anonymity

A whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data. Confidentiality The Value Standards Committee will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.

8. Who is a whistle blower officer?

For the purpose of this policy, the whistle blower officer will be Company Secretary or CFO of the Company and the Company Secretary shall be considered to act as the Whistle Blower Officer.

9. Procedure for raising a complaint

A whistleblower can make a complaint by sending an Email to the e-mail id compliance@rexseal.com. The complaints if any shall be placed in the Audit Committee meeting for resolution.