

VIGIL MECHANISM/ WHISTLE BLOWER POLICY **(MARBLE CITY INDIA LIMITED)**

Purpose:

Marble City India Limited (“the Company”) believes in promoting a fair, transparent, ethical and professional work environment.

The purpose of this policy is to provide a framework through which all the Directors and employees report their general concerns and actual/ potential violations to the designated officials of the company fearlessly, as provided in section 177 of the companies Act, 2013 and rules made thereunder, Regulation 22 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 as amended from time to time, and other applicable laws.

Applicability:

This Policy is applicable to the Company, to all their employees and directors whether working in India or elsewhere. The Policy also extends to all consultants, vendors, suppliers, dealers, customers and contractors working for and/ or on behalf of any of the Group entities. There are no exclusions of this Policy.

Procedure to raise a complaint:

All Complaint should be reported in writing by the Whistle Blower as soon as possible, but not later than 30 (thirty) working days after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English or Hindi.

All Complaints addressed to pgindustry ltd@gmail.com or hard copy of the same should be sent at the below mentioned address.

To,
The Chairman of the Audit Committee
Marble City India Limited,
A-30, S-11, 2nd Floor,
Kailash Colony,
New Delhi - 110048

The Complaint should be submitted under a covering letter signed by the Whistle Blower and bearing his identification in a closed and secured envelop or sent through e-mail to the mentioned Address.

Investigation Procedure:

All the complaints received by the officials shall be logged and thereafter shall be forwarded to the Audit Committee.

The investigation will be carried out to determine the authenticity of the allegations and for fact-finding process. The investigation team should not consist of any member with possible involvement in the said allegation.

During the investigation, full details and clarification of the Complaint will be obtained from the Whistle Blower as soon as the Complaint is received and it should be in writing. Though, the Whistle Blower need not prove the truth of the allegation, yet he/she will be expected to demonstrate that there is sufficient ground for the concern raised.

Each Complaint shall be reviewed by the Audit Committee, which may consult with any member of management or employee, or external party who is believed to have appropriate expertise or information to assist the investigation.

The Audit Committee shall have the right to dismiss a complaint on the basis of the type of complaint, quality and accuracy of the preliminary evidence provided or any other valid factor(s) in view of the Audit Committee.

The decision to conduct an investigation taken by the Audit Committee is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may not support the conclusion of the Whistle Blower that an Improper or Unethical Activity was committed.

The Investigators shall have right to call for any information/ document and examination of any employee of the company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.

If and when the Audit Committee is satisfied that the Improper or Unethical Activity existed or is in existence, then the Audit Committee may –

- Recommend to management to reprimand, take disciplinary action, impose penalty/ punishment which shall include (but not limited to) wage freeze, suspension, termination from employment, recovery clawback etc; and / or
- Recommend termination or suspension of any contract or arrangement or transaction vitiated by such wrongful act.

The Audit Committee shall ensure that the Whistle Blower is fully protected in terms of his identity and any retaliatory action against him. Any person, who may be found to be taking such retaliatory action against the Whistle Blower, will be subject to the strictest disciplinary action including termination, or for civil/ criminal or administrative penalties.

Protection:

The Audit Committee shall ensure:

1. Protection of complainant/ witness, if any, against any harassment and victimization.
2. Protection of the complainant identity

The Company shall also annually affirm that it has not denied any personal access to the Audit Committee and that it has provided adequate safeguards and protection to Whistle Blower from adverse personnel action. The aforesaid affirmation shall form part of Board's report as attached to the Annual Report of the Company.