

**WHISTLEBLOWER PROTECTION POLICY- PERFECTPAC LIMITED**

**Perfectpac Limited** requires Directors, Officers and Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the **Perfectpac Limited**, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility**

Each director, volunteer, and employee of **Perfectpac Limited** has an obligation to report in accordance with this whistle-blower policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of **Perfectpac Limited's** code (concerns).

**No Retaliation**

It is contrary to the values of **Perfectpac Limited** for anyone to retaliate against any Board member, Officer, and Employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of **Perfectpac Limited**. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**Employees**

Employees should first discuss their concern with their immediate supervisor. However, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the concern, the individual should report his or her concern directly to the Compliance

Officer. In addition, suspected fraud should be reported directly to the Chair of the Audit Committee, **Shri Satram Lokumal Keswani**, who may be contacted by phone at (011-46060200-220), by e-mail at (chemprojects1@airtelmail.in):

### **Reporting Procedure**

**Perfectpac Limited** has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any board member. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the **Perfectpac Limited's [Compliance Officer]** who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization's Compliance Officer.

### **Compliance Officer**

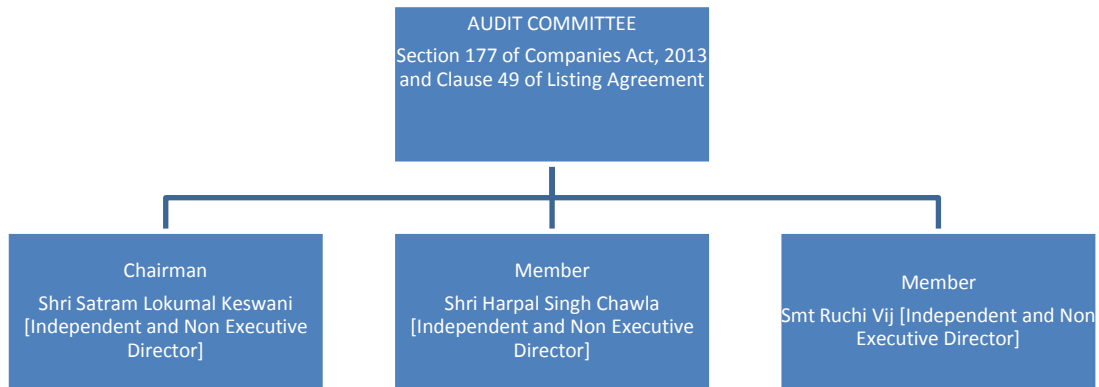
The **Perfectpac Limited [Compliance Officer]** is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the [Audit Committee] on compliance activity relating to accounting or alleged financial improprieties.

### **Handling of Reported Violations**

The audit committee shall address all reported concerns. The chair of the audit committee shall immediately notify the audit committee, the CFO, of

any such report. All reports will be promptly investigated by the audit committee, and appropriate corrective action will be recommended to the board of directors.

**MEMBERS OF AUDIT COMMITTEE**



**Acting in Good Faith**

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the code. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense. It may also result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to

conduct an adequate investigation.

**Handling of Reported Violations**

The **Perfectpac Limited** [Compliance Officer] will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**Details of Compliance Officer:**

**Miss Seepika Gupta**

**Company Secretary/ Compliance Officer**

Can be contacted at:

**complianceofficer@perfectpac.com**

**Policy approved in Board Meeting held on 28<sup>th</sup> May, 2015**