

Vigil Mechanism

With the rapid expansion of business in terms of volume, value and geography various risks associated with the business have also increased considerably. One such risk identified is the risk of fraud and misconduct. The Audit Committee is committed to ensure fraud free work environment and to this end the committee had laid down a "Fraud Risk Management Policy" providing a platform to all the Employees, Vendors and Customers to report any suspected or confirmed incident of fraud/misconduct through any of the following reporting protocols:

Phone: 020 3061333

E-mail: Rounak.chiraniya@pudumjee.com

Written communication should be addressed to Mr. Rounak Chiraniya, Chartered Accountant who is Independent Chief Internal Auditor at C/o 3P Land Holdings Ltd. Thergaon, Pune-411033.

In order to instill more confidence amongst Whistle Blowers the management of the above reporting protocol are managed by Independent Chief Internal Auditor of the company Mr. Rounak Chiraniya, Chartered Accountant. The policy is applicable to all the Directors, Employees, Vendors and Customers of the Company. The main objectives of the policy are as under:

- To protect the brand, reputation and assets of the Company from loss or damage resulting from suspected or confirmed incidents of fraud or misconduct.
- To provide guidance to Employees, Vendors and Customers on reporting any suspicious activity and handling critical information and evidence.
- To provide healthy and fraud free work culture.

The Audit Committee and Chief Internal Auditor, Mr. Rounak Chiraniya of the Company are responsible for the following:

- Implementation of the policy and spreading awareness amongst Employees.
- Review all reported cases of suspected fraud/misconduct.
- Order investigation if necessary of any case either through internal audit or through external agency.
- Recommend to the management for taking appropriate actions such as disciplinary action, termination of service, changes in policy and procedure and review of internal control system.

The Chief Internal Auditor functions independently and reports to the Audit Committee.

The Company may amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever. This modified policy will be binding on the parties on its publication.