

# GUJARAT TEA PROCESSORS AND PACKERS LIMITED

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## DETAILS OF ESTABLISHMENT OF VIGIL MECHANISM

The Vigil Mechanism has been established by the Company for all employees and directors of the Company to report genuine concerns.

### **MECHANISM:**

- The complaint should be forwarded with a letter (bearing identity of Complainant i.e., his/her Full Name, Employee Code and Location) in a closed envelope duly secured/sealed addressed to the Chairperson of Audit Committee with the words "Vigil Complaint" mentioned on envelope.
- Complaint received without proper details stated as above shall not be entertained.
- Complaint should either be typed or written in legible hand writing in English, Hindi or Regional Language of the place of employment of the complainant. It should provide a clear understanding of the improper activity involved or issue/concern raised. The reporting should be based on facts and should not be speculative in nature. It must contain relevant information/documents only.
- Only Independent Directors of the Audit Committee will deal with the complaints received in order to have unbiased resolution of the complaints.
- At the discretion of the Audit Committee, initial inquiries may be made to ascertain whether an investigation is required to be made. After completion of inquiry, a detailed report will be prepared. Sometime concerns may be resolved by agreed action without any investigation depending upon the facts and circumstances of the case.
- The complainant will be given the opportunity of being heard personally & also to receive a report on the complaint.
- Depending upon the requirement, further information may be sought from the complainant by the Audit Committee.
- In case of investigation leading to a conclusion that an improper or unethical act has been committed, the Chairperson of the Audit Committee shall recommend to the Board of Directors to take such disciplinary or corrective actions as it may deem fit.
- If initial/preliminary inquiries indicate that the concern has no basis, or it is not a matter to be further investigated or pursued, it may be dismissed at that stage and the decision will be documented.
- In case the complaint is not proved, it may be closed and taken note of the same or depending upon the seriousness of the matter, the investigation authority may suggest appropriate counter measures.
- In case the Audit Committee thinks that the matter is too serious, it can further place the matter before the Board with its recommendations. The Board may decide the matter as it may deem fit.
- Any disciplinary or corrective action initiated as per the findings of an investigation shall be consisting with the applicable personnel or staff conduct and disciplinary procedures.
- A complainant who makes false allegations of unethical & improper practices or about alleged wrongful conduct of the subject shall be subject to appropriate disciplinary action in accordance with the rules, policies and procedures of the Company.
- In case of repeated frivolous complaints being filed by a director or an employee, the Audit Committee may take suitable action against the concerned director or employee including reprimand.