



**“WHISTLE BLOWER POLICY” /
“VIGIL MECHANISM POLICY”**

“JIYA ECO-PRODUCTS LIMITED”

Registered Office:

G-6/7 B, Raturaj Complex,
Opp. A.V. School Ground,
Crecent Road,
Bhavnagar-364001
Tel. No.: 02841-281028

Corporate Office:

A-25, Circle ‘B’,
Above Pakwan-2,
Judges Bungalow Road,
Bodakdev, Ahmedabad- 380054
M- 75730 16361

WHISTLE BLOWER POLICY

A) Applicable Provisions

- This Policy is formulated in terms of the requirements of section 177 of the Companies Act, 2013, Circular No. SEBI/CFD/DIL/CG/1/2004/12/10 dated October 29, 2004, Circular no. CIR/CFD/POLICY CELL/2/2014 on April 17, 2014 issued by Securities and Exchange Board of India (SEBI), Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 read with Listing Agreement with the Stock Exchanges.
- According to Section 177(9) of the Companies Act, 2013 ('the Act') provides that every listed company shall establish a vigil mechanism for directors and employees to report genuine concerns in such manner as may be prescribed. Sub-section (10) of section 177 provides that the vigil mechanism under sub-section (9) shall provide for adequate safeguards against victimisation of persons who use such mechanism and make provision for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases. The details of establishment of such mechanism shall be disclosed by the Company on its website, if any, and in the Board's report.

B) Objective

- The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behaviour.
- This policy is formulated to provide employee an avenue to lodge Complaints, in line with the commitment of Company to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication, and also to provide necessary safeguards for protection of employees from reprisals or victimization, for whistle-blowing in good faith.
- The purpose of this policy is to provide a framework to protect employees wishing to raise a concern about serious irregularities within the Company.

C) Reporting of violation / suspected violation:

- Everyone is required to report to the Company any genuine concerns or grievances or violation or potential violations / suspected violation of any applicable law and any violation / suspected violation of the Code of Conduct adopted by the Company.
- Retaliation for reporting concerns, violations, etc. is strictly prohibited.
- Retaliation includes adverse actions, harassment or discrimination in employment relating to reporting of a suspected violation.

- Timely reporting will help the Company for proper investigation.
- Failure to report is a violation of this Policy.
- Any such failure will be addressed with appropriate disciplinary action which may include immediate termination of employment.
- Reporting may include as requisite information regarding suspected violation like the persons involved, nature of suspected violation, the documents relating to suspected violation and period of suspected violation.
- Director/Employee may be contacted in case he/she has not reported anonymously.

D) Reporting mechanism

Director/Employee must report suspected violations /violations:

- To immediate supervisor; or
- To Compliance Office of the Company; or
- Anonymously, by sending an e-mail to: cs@lippisystems.com, or
- By sending an anonymous letter to the Compliance Officer of the Company at:

To Company Secretary,
JIYA ECO-PRODUCTS LTD,
A-25 Circle 'B', Above Pakwan-2,
Judges Bungalow Road,
Bodakdev,
Ahmedabad-380054
(M)- 75730 16361; or

- In case director/employee believes that supervisor or the Compliance Officer is involved in the suspected violation then report may be made to the Audit Committee of the Company's Board of Directors (the "Audit Committee") at: The Chairman, Audit Committee, JIYA ECO-PRODUCTS LTD, G-6/7 B, Raturaj Complex, Opp. A.V. School Ground, Crecent Road, Bhavnagar- 364313

E) Investigation by the Company

- Reporting of suspected violation will be appropriately investigated.
- The information disclosed during the course of the investigation will remain confidential except as necessary to carry out investigation and take action.
- Director/Employee has to cooperate during the investigation.
- Failure to cooperate during investigation or giving incorrect / false information will be a ground for disciplinary action including termination of employment.
- If it is found that violation has occurred, the Company will take appropriate action.

F) Confidentiality

The Company will keep confidential, subject to applicable laws and policies of the Company, all the information and other documents regarding reporting, investigation and enforcement under this Policy.

G) Right of amendment

- The Audit Committee or the Board of Directors of the Company can amend or modify this Policy.
- Policy may be amended or modified at the sole discretion of the Audit Committee or Board of Directors of the Company at any time for any reasons including to continue complying with applicable laws.

H) Website

- This policy shall be hosted on the website of the Company.