

WHISTLE BLOWER POLICY / VIGIL MECHANISM OF THE COMPANY

This whistle Blower Policy / Vigil Mechanism (mechanism) is formulated for securing / reporting / deterring / punishing / rectifying any unethical, unlawful acts, behaviour etc. and to enable to voice/ address bonafide concern of malpractice, deviation from the policies of the Company internally in an effective and systematic manner after its discovery.

This mechanism is in accordance with the requirements of the listing agreement and Section 177 of the Companies Act, 2013 and rules made there under. Any future amendments to the said Act / rules will necessitate amendment of this policy to be in tandem with the prevailing statute.

Applicability :-

The mechanism shall, in relation to the company , apply to all the directors, employees or any other persons as may be decided by Board of Directors of the company.

Designated officer: -

The compliance officer shall be designated officer for the purpose of the mechanism.

Scope:-

The following activities, events, occurrence may be brought to the notice of Designated Officer – Abuse of power, violation of code of conduct, breach of contract, unethical, immoral conduct, fraud or financial irregularities, any activity which is unlawful, manipulating or tampering with record or data of the company and concealment of the above activity.

Procedure:-

1. Any person may disclose, preferably in writing to the Designated Officer about the matter of wrong doing, name, evidence, if any, remedial action, other relevant details.
2. The Designated Officer shall thoroughly scrutinize the discloser received. If after initial scrutiny, it is found that the allegation is frivolous and not maintainable or outside the scope of mechanism the same may be dismissed. If it is found that the issue requires further investigation the same may be initiated.
3. The Designated Officer will investigate the matter in detail. He should give reasonable opportunity to the wrongdoer to put forth his contention, consider all the facts financial or other loss incurred / may be incurred by the company, documentary evidence etc. The investigation should be completed in reasonable time preferably within 30 days. The Designated Officer shall prepare a report on investigation and place it before audit committee meeting who shall decide the action to be taken.

The Designated Officer shall ensure that the procedure undertaken in the mechanism is confidential so that nobody is victimised, harassed or discriminated

As required under Section 177 of the Companies Act, 2013, the details of this mechanism shall be disclosed by the Company on its website www.regalentertainment.in and in the report of Board of Directors.