



# emami\* paper mills limited

## WHISTLE BLOWER POLICY

### 1. Preamble

- a) EMAMI PAPER MILLS LIMITED (EPM) believes that the activities of the Company and its employees should be conducted in a fair and transparent manner by adoption of highest standards of professionalism, honesty, integrity and ethical behavior. Towards this objective, EPM has adopted Code of Conduct (" the Code") which lays down the principles and standards which would govern the actions of EPM and its employees. The Code provides for the company to have a Whistle Blower Policy ("the Policy") so that any potential violation of "the Code" should be taken up most seriously and appropriate steps should be taken by the management.
- b) Every listed company and the Companies belonging to the following class or classes shall establish a Vigil Mechanism for their Directors and Employees to report genuine concerns:-
  - Companies which accept deposits from the public; and
  - Companies which have borrowed money from banks and public financial institutions in excess of fifty crore rupees;
- c) Vigil Mechanism shall be operated through the Audit Committee for its Directors and Employees to report genuine concerns. If any of the members of the Audit Committee are conflicted in a given case, they should recuse themselves and the others on the committee would deal with the matter on hand.

## 2. **Policy**

- a) To provide for adequate safeguards against victimization of Employees and Directors who avail of the mechanism and also provide for direct access to the chairperson of the Audit Committee or the Director nominated to play the role of Audit Committee, as the case may be, in exceptional cases.
- b) The existence of the mechanism will be appropriately communicated within the organization after its establishments.
- c) In case of repeated frivolous complaints being filed by a Director or an employee, the Audit Committee or the Director nominated to play the role of Audit Committee may take suitable action against the concerned Director or Employee including reprimand.
- d) The Company encourages an open door policy where employees have access to the Head of the Business/Function. Any Employee may report unethical attitude at the workplace without fear and reach the Chairman of the Audit Committee.
- e) The contact details of the Chairman of the Audit Committee are as under:

Mr. Jayant Narayan Godbole  
604/A, Cottage Land Chs,  
Plot 16/A, Sector 19/A,  
Nerul(E ), Mumbai- 400 706  
Phone: 9324053454  
Email: [jayantgodbole1945@gmail.com](mailto:jayantgodbole1945@gmail.com)

The contact details of the Compliance officer of the Company are as under:

Mr. Ghanshyam Saraf  
687, Anandapur, E.M. Bypass,  
Kolkata 700 107  
Phone: 9830024401  
Email: [gsaraf@emamipaper.in](mailto:gsaraf@emamipaper.in)