

Fraud Prevention Policy/ Whistle Blower Policy

1. Background

In accordance with Section 177 of Companies Act, 2013 and Clause 7 of the Companies (Meeting of Board and its Powers) Rules, 2014, the company needs to establish a vigil mechanism for their directors and employees to report their genuine concerns or grievances.

This policy enables an employee or a group of employees who wish to report on unethical or improper practices to have easy access to the appropriate authority. The purpose of this policy is to provide a framework to promote responsible, safe and secure whistle blowing, with an aim to curb and stop all activities, which are against organizational interests.

The vigil mechanism will:

- provide adequate safeguards against victimization of employees and directors who avail of the vigil mechanism
- provide direct access to the Chairperson of the Audit Committee.
- 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 appraisal.

2. Definition of Fraud

"Fraud" is a willful act intentionally committed by an individual(s) by deception, suppression, cheating or any other fraudulent or any other illegal means, thereby, causing wrongful gain(s) to self or any other individual(s) and wrongful loss to other(s). Many a times such acts are undertaken with a view to deceive/mislead others leading them to do or prohibiting them from doing a bonafide act or take bonafide decision which is not based on material facts.

3. Actions Constituting Fraud

While fraudulent activity could have a very wide range of coverage, the following are some of the act(s) which constitute fraud. The list given below is only illustrative and not exhaustive:--

- Forgery or alteration of any document or account belonging to the Company.
- Forgery or alteration of cheque, bank draft or any other financial instrument etc.
- Misappropriation of funds, securities, supplies or others assets by fraudulent means etc.
- Falsifying records such as pay rolls, removing the documents from files and/or replacing it by a fraudulent one etc.
- Willful suppression of facts/deception in matters of appointment, placements, submission of reports, tender committee recommendations etc. as a result of which a wrongful gain(s) is made to one and wrongful loss(s) is caused to the others.
- Utilising Company funds for personal purposes.
- Authorizing or receiving payments for goods not supplied or services not rendered.
- Destruction, disposition, removal of records or any other assets of the Company with an ulterior motive to manipulate and misrepresent the facts so as to create suspicion/suppression/cheating as a result of which objective assessment/decision would not be arrived at.
- Any other manner which affects the reputation of the company.

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**Stuart H. Bompey, Max G. Brittain, Paul
I. Weiner**

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California. Court of Appeal (2nd Appellate District). Records and Briefs California (State)., **California. Court of Appeal (1st Appellate District). Records and Briefs** California (State)., **California. Court of Appeal (4th Appellate District). Division 2. Records and Briefs** California (State)., **Wrongful Termination Claims, 2000** ,2000 *California. Court of Appeal (3rd Appellate District). Records and Briefs* California (State)., Number of Exhibits 1 *Wrongful Termination Claims* ,1999 California. Supreme Court. Records and Briefs California (State)., Court of Appeal Case s B037184 *Wrongful Termination* Jenna Bennett,2018-12-21 If you enjoy your cozy mysteries with a good shot of romance and a love triangle with a sexy bad boy and a Southern gentleman in the mix then you will love this Very reminiscent of the Stephanie Plum books but the laughs are louder the romance is sexier and there is a great murder mystery to top it off Bella McGuire Cozy Mystery Book Reviews Savannah Martin has always been a good girl doing what was expected and fully expecting life to fall into place in its turn But when her perfect husband turns out to be a lying cheating slimeball and bad in bed to boot Savannah kicks the jerk to the curb and embarks on life on her own terms With a new apartment a new career and a brand new outlook on life she s all set to take the world by storm If only the world would stop throwing her curveballs When Savannah s husband Rafe loses his position with the Tennessee Bureau of Investigations Savannah gets excited about the prospect of them taking their new baby and moving back to their hometown of Sweetwater Rafe has already received a job offer from the Columbia Police Department and although he doesn t seem terribly interested in accepting Savannah would enjoy having her family around not to mention Rafe s grandmother Mrs Jenkins But before they can make any decisions Rafe s former boss at the TBI turns up dead And Rick Goins the MNPd detective in charge seems determined to prove that Rafe had something to do with it Detective Tamara Grimaldi former colleague of Goins and now Chief of Police for Columbia swears that while it might take him some time Goins usually comes up with the right solution in the end But with fresh victims dropping like flies and someone seemingly doing their best to fan the flames of Goins s biases Savannah isn t sure she can wait for the detective to come to his senses Because while she d like to move back to Sweetwater she doesn t want it to be because her husband is behind bars VERDICT The hilarious dialog and the tension between Savannah and Rafe will delight fans of chick lit mysteries and romantic suspense Jo Ann Vicarel Library Journal TOPICS romantic mystery romantic suspense interracial romance multicultural romance female protagonist woman sleuth amateur sleuth cozy mystery Southern humor mystery series romance series bestseller **Wrongful Termination Claims** Stuart H. Bompey,Max G. Brittain,Paul I. Weiner,1991 Directory of Federal Court Guidelines In-house: MR,1996-01-01 The Directory of Federal Court Guidelines outlines the requirements of over 600 federal judges in detailed form along with the procedures they mandate on such essential matters as discovery scheduling conferences alternative dispute resolution voir dire marking of exhibits and jury participation This is critical inside information directly from the federal courts and judges

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