

# **VIGIL MECHANISM POLICY**

## **Introduction:**

The Company shall formulate a policy to provide an opportunity to its Employees and Directors to report their genuine concerns or grievances to the Audit Committee 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.

In compliance with the aforesaid Act, the Company has framed the Vigil Mechanism Policy.

## **Applicability:**

Pursuant to Section 177(9) of the Companies Act, 2013, every listed company and class or classes of companies (1. The Companies which accept deposits from the public; 2. The Companies which have borrowed money from banks and financial institutions in excess of fifty crore rupees) a mechanism called "Vigil Mechanism" for aforesaid purpose. It is effective from 1<sup>st</sup> April 2014.

## **Scope:**

It covers all the Permanent employees and Director of the Company.

## **Definition:**

- The Company means R. K. Transport and Constructions Limited.
- Employees mean all employees of the Company.
- Directors means define as per Section 2(34) of the Companies Act, 2013.
- Audit Committee shall mean a Committee of Board of Directors of the Company, constituted in accordance with provisions of Section 177 of Companies Act, 2013.
- Policy or This Policy means, "Vigil Mechanism Policy".

## **Guidelines:**

- ***Frivolous Complaints***

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.

- ***Protection under Policy***

The vigil mechanism shall provide for adequate safeguards against victimization of employees and directors who avail of the vigil mechanism and report their genuine concerns or grievances.

- ***Disclosure and Maintenance of Confidentiality***

Employees and Directors shall report to Committee through e-mail addressed to [compliance@rktcgroup.com](mailto:compliance@rktcgroup.com). Confidentiality shall be maintained to the greatest extent possible.

**Interpretation:**

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 read along with the rules as amended from time to time.

**Savings:**

This policy can be changed, modified or abrogated at any time by the Audit Committee of the Company.

**Safeguards against victimization:**

No one would take any adverse action against any Director/employee for complaining about, reporting or participating or assisting in the investigation of reasonably suspected violations of any law, this policy. The company would take reports of such retaliation action seriously. Incidents of retaliation against any employee reporting a violation or participating in the investigation of a reasonably suspect violation may result in appropriate disciplinary action.

How and whom to report:

The employee who suspects any violations of the nature referred to therein above should report the complaint, accompanied with all available details and evidence to the extent possible, to Enforcement Committee, consisting of following officials of the Company:

- I. Mr. Vijay Agrawal – Independent Director (Chaiman)
- II. Mr. Dashrath Prasad Mishra – Independent Director
- III. Mr. Amar Agrawal - Director

The complaint should be addressed to the Chairman of the Enforcement Committee at:-

Chairman - Enforcement Committee  
R. K. Transport and Constructions Limited  
HIG-7, Behind Madan Complex,  
Shankar Nagar, Sector-2  
Raipur – 492007  
Chhattisgarh

The Enforcement Committee will evaluate the complaint and recommend action, if any within a period of month to Chairman of Audit Committee.  
The Director in all cases and employees in appropriate or exceptional cases will have direct access to the Chairman of the Audit Committee and such complaint should be addressed at:

Chairman - Audit Committee  
R. K. Transport and Constructions Limited  
HIG-7, Behind Madan Complex,  
Shankar Nagar, Sector-2  
Raipur – 492007  
Chhattisgarh

**Notification:**

The Compliance Officer shall be responsible for intimating to all Directors and Departmental heads of any changes in policy.

This policy as amended from time to time shall be disclosed by the company on its website and in the Board's report.

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