



PINNACLE INDUSTRIES LIMITED

CIN: U50300PN1996PLC100600

9th Floor Panchshil Tech Park 1, Besides Rahul Theatre, Shivajinagar, Pune, Maharashtra –
411005, India.

WHISTLE-BLOWER POLICY

Section 177 of the Companies Act, 2013 and Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 requires every eligible company, to establish a vigil mechanism for its directors and employees to report genuine concerns or grievances about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct. Such a vigil mechanism shall provide for adequate safeguards against victimization of its directors and employees who avail of such mechanism.

Pinnacle Industries Limited (**the Company**) believes in the conduct of the affairs in a fair and transparent manner, by adopting highest standards of professionalism, honesty, integrity and ethical behavior.

The purpose of this Policy is to provide a framework to promote responsible and secure whistleblowing. It protects the Whistle blowers wishing to raise a concern about serious irregularities within the Company. “**Whistleblower**” is defined as any director, employee, officer of the Company who reports an activity that he/ she considers to be illegal or dishonest. The Whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

The Company will ensure complete confidentiality so that the Whistleblower is not victimized. The Company will provide an opportunity of being heard to the persons involved, treat victimization as a serious matter.

While this Policy is intended to protect genuine Whistleblowers from any unfair treatment as a result of their disclosure, the misuse of this protection by making frivolous and bogus complaints with malafide intentions, is strictly prohibited and should invite strict disciplinary action.

A Whistleblower can lodge his say with the Managing Director, not later than 30 consecutive days of the irregularity, or by contacting the Chairman of the Audit Committee in exceptional cases. The Whistleblower must provide identity details of his / her own identity, and all other relevant details and disclosure.

Any concerned person, at the outset of formal investigations, may be informed of the allegations against him/ her, and be provided an opportunity to reply to such allegations. If they fail to cooperate in an investigation, or deliberately provide false information during an investigation, they would be subjected to disciplinary action.

The Company reserves the right to refer any complaints, if it deems necessary, to appropriate external Regulatory Authorities.

The Managing Director/Audit Committee may delegate the investigation of complaint to any Officer(s)/Committee as he/it may deem appropriate.

The Officer(s)/Committee entrusted with the investigation of complaint shall adhere to following steps-

- i. Make a written record of the complaint.
- ii. Investigation of the issues involved.
- iii. Finalise the report within 90 days of complaint being received.
- iv. Shall discuss the matter with the Audit Committee, if the issue is serious or involves larger financial loss to the Company.
- v. The Audit Committee shall address all concerns or complaints which are placed before it, and ensure resolution of the same.

If, at the conclusion of its investigation, the Company determines that a violation has occurred or the allegations are substantiated, the Company will take effective remedial action commensurate with the severity of the offence. This will address improvement in operating rules, regulations of the Company. This may include disciplinary action against any persons who have indulged in fraudulent activities.

It is imperative that the Whistleblower shall bring the matter to the Company's attention promptly regarding any concern of reprisal or discrimination etc., so that it may be investigated, and addressed promptly and appropriately.

Documentation of all complaints or reports, subjected to this Policy, shall be maintained by the Company.

Nothing in this Policy is intended to prevent any person from reporting information to the appropriate Agency when the person has reasonable cause to believe that the violation of a central, local or state statute or regulation has occurred.

This Whistleblower Policy has been developed, as a guide for stakeholders to their legal and ethical responsibilities, to achieve and maintain the highest business standards.
