BARODA EXTRUSION LTD.
where copper takes shape

CIN NO.: L27109GJ1991PLC016200

WHISTLE BLOWER POLICY

Regd Office and Works:
Survey No 65/66,
Village: Garadhiya Jarod-Samlaya Road,
Taluka: Savli, Vadodara - Halol Highway,
District: Vadodara 391520, Gujarat, India.

+91 93277 71212,
+91 93777 43544
works@barodaextrusion.com
www.barodaextrusion.com

1. The purpose of this policy

The company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. If potential violations of company policies or applicable laws are not recognized and address promptly, both the company and those working for or with the company could face governmental investigation, prosecution, fines, and other penalties. Violation of company policies and applicable law will affect the company's reputation and image. Consequentially, and to promote the highest ethical standards, the company will maintain a workplace that facilitates the reporting of potential violations of company policies and applicable laws. Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (the "policy" or the "whistleblower policy").

2. Your duty to report

Employee is required to report to the company any suspected violation of any law that applies to the company and any suspected violation of the company's Code of Conduct and Ethics. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations, i der trading, bribery, or violations of the anti-retaliation aspects of this policy. Retaliation includes adverse actions, harassment, or discrimination in your employment relating to your reporting of a suspected violation.

It is the policy of the company that you must, when you reasonably suspect that a violation of an applicable law or the Company's Code of Conduct and Ethics has occurred or is likely to occur, report that potential violation. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of company policies or applicable laws. You could not fear any negative consequence for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy.

3. How to report

You must report all suspected violations to the Chairman of the audit committee i.e. Mr. Rikesh Shah at the following address.

Mr. Rikesh Shah Audit Committee
Baroda Extrusion Limited
Email: works@barodaextrusion.com

Your report should include as much information about the suspected violation as you can provide. Where possible, it should describe the nature of the suspected violations, the identities of persons involved in the suspected violations, a description of documents that relate to the suspected violation, and the time frame during which the suspected violation occurred.

4. Protection

No unfair treatment will me mated out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this policy. The company, as a policy, does not encourage any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct and indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/ functions including making further protected disclosure. The company will take steps to minimize difficulties, which the whistle blower may experience as a result of making the protected disclosure.

The identity of the whistle blower shall be kept confidential to the extent possible and permitted under law. Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

5. Investigations

All report under this policy will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. Everyone working for or with the company duty to cooperate in the investigation of violations. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action, including termination of employment.

6. **Decision**

If at the conclusion of its investigation, the company determines that a violation has occurred, the company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

7. Document Retention

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the applicable law.

8. Modification

The audit committee or the Board of Directors of CNI Research Limited reserves the right to modify this policy. Modification may be necessary, among other reason, to maintain compliance with federal, state of local regulation and / or accommodate organization changes within the Company.

SAMPLE FORMATE FOR WHISTLE BLOWING

Date		
Name of the Employee/Director		
E- mail Id of the employee/Director		
Communication Address		
Contact No.		
Subject matter which is reported		
(Name of the person/ event focused at)		
Brief about the concern		
Evidence (enclose, if any)		