

# Windsor Machines Limited

## Brief content of Whistle Blower Policy of the Company

Pursuant to Section 177 (9) of the Companies Act, 2013 & Rule 7 of the Companies (Meeting of Board & Its Powers) Rules, 2014 and Clause 49 of the Listing Agreement, Windsor Machines Limited has established the Vigil Mechanism, by formulating Whistle Blower Policy (WBP), for Directors and Employees of the Company to report their genuine concerns or grievances to the Company or, if so desired by him, directly to the Chairman of the Audit Committee of the Company. The WBP covers any concern or grievance he may have including the following malpractices and events which have taken place/ or is suspected to take place in the Organisation:

1. Abuse of authority
2. Breach of contract
3. Negligence causing substantial and specific danger to public health and safety
4. Manipulation of company data/records
5. Financial irregularities, including fraud, or suspected fraud
6. Criminal offence
7. Proliferation of confidential/propriety information
8. Deliberate violation of law/regulation
9. Wastage/misappropriation of company funds/assets
10. Breach of employee Code of Conduct or Rules
11. Any other unethical, biased, favoured, imprudent event

### **Manner in which concern can be raised**

The Directors and Employees of the Company can make a “Protected Disclosure” about their genuine concerns or grievances to the Company or, if so desired by him, directly to the Chairman of the Audit Committee as soon as possible after being aware and giving all specific details as he may be aware.

The Contact details of the current Chairman of the Audit Committee are as under:

Name :	Mr. Shishir Dalal
Designation:	Chairman of Audit Committee of the Company
Postal Address:	Windsor Machines Limited Plot No. 5402-5403, Phase IV, GIDC, Vatva, Ahmedabad -382445
Phone no.	+91 79 30262100, 25841111,25841591-2-3
Fax no.	+91 79 25842145
Email id	<a href="mailto:shishir.dalal@windsormachines.com">shishir.dalal@windsormachines.com</a>

Name of the Whistle Blower shall not be disclosed. Genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment. Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide or frivolous, shall be liable to be prosecuted as per existing policy of the Company and applicable law.