



# **MALANKARA PLANTATIONS LIMITED**

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## **Malankara Plantations Limited**

### **Vigil Mechanism / Whistle Blower Policy**

*(Pursuant to Regulation 22 of SEBI (LODR) Regulations, 2015 and Section 177 of the Companies Act, 2013)*

#### **1. Preamble**

Malankara Plantations Limited ("the Company") believes in conducting its business with integrity, transparency, and accountability. The Company is committed to developing a culture where it is safe for all employees and stakeholders to raise concerns about any unethical behavior, actual or suspected fraud or violation of the Company's code of conduct or any applicable laws and regulations.

This Policy provides a framework to promote responsible and secure whistleblowing and ensures adequate safeguards against victimization of persons who use this mechanism.

#### **2. Objective**

The objective of this Policy is to:

- Provide a platform for employees, directors and other stakeholders to report genuine concerns;
- Encourage ethical corporate behavior and provide a transparent mechanism for reporting issues;
- Protect whistleblowers from unfair treatment, harassment or victimization;
- Comply with the requirements of Regulation 22 of SEBI (LODR) Regulations, 2015 and Section 177(9) and (10) of the Companies Act, 2013.

#### **3. Applicability**

This Policy applies to all:

- Directors,

- Employees (permanent, contractual, temporary),
  - Business associates,
  - Vendors, consultants and
  - Other stakeholders of the Company.
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#### 4. Scope of the Vigil Mechanism

The mechanism enables stakeholders to report concerns such as:

- Misappropriation of Company assets;
  - Financial or accounting fraud;
  - Violation of Company policies or Code of Conduct;
  - Insider trading;
  - Non-compliance with legal or regulatory requirements;
  - Any other unethical, biased, imprudent or illegal practices.
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#### 5. Whistleblower

A whistleblower is any person covered under this policy who discloses or reports a concern in good faith.

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#### 6. Procedure for Raising a Concern

- The concern should be reported in writing (letter or email) with adequate details and supporting documents, if any.
  - Whistleblowers can email their concerns to the **Designated Officer** at:  
✉ [cs@malankaraplantations.co.in](mailto:cs@malankaraplantations.co.in) or  
Post a written complaint in a sealed envelope marked "**Private and Confidential – To be opened by the Chairperson of the Audit Committee only**" to the Registered Office.
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#### 7. Investigation

- Upon receipt of a complaint, the **Chairperson of the Audit Committee** or a designated **Vigilance Officer** shall assess the concern and initiate an investigation.
  - All concerns will be treated confidentially and investigated promptly.
  - The identity of the whistleblower shall be kept confidential unless required by law.
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#### 8. Protection of Whistleblower

- No unfair treatment, discrimination, or harassment will be meted out to any whistleblower.
  - The Company will protect whistleblowers from retaliation, victimization, or any adverse action.
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- Any attempt to suppress or victimise the whistleblower will attract disciplinary action.
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### **9. False Allegations**

Whistleblowers are expected to act in good faith. False, malicious or frivolous complaints may result in disciplinary action.

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### **10. Role of the Audit Committee**

- The Audit Committee shall oversee the vigil mechanism and periodically review the functioning of the Whistle Blower Policy.
  - The Audit Committee shall ensure that no employee or stakeholder is victimized as a result of using this mechanism.
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### **11. Reporting and Disclosure**

- A report on the complaints received and action taken shall be submitted periodically to the Audit Committee and the Board.
  - The existence of this policy shall be disclosed on the Company's website and in the Corporate Governance section of the Annual Report.
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### **12. Retention of Records**

All documentation pertaining to complaints, investigation and actions taken will be maintained for a minimum of 8 years.

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### **13. Amendment**

The Board may amend or modify this Policy in line with regulatory changes and recommendations of the Audit Committee.

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This Policy shall be disclosed on the Company's website:

🌐 [www.malankaraplantations.com](http://www.malankaraplantations.com)

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For Malankara Plantations Ltd.

  
Managing Director