

SURYA INDIA LIMITED

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VIGIL MECHANISM/WHISTLE-BLOWER POLICY

The Company has established a proper Vigil Mechanism by making Vigil Mechanism Policy which is designed to enable employees, Directors, consultants and contractors to raise concerns at a significantly senior level and to disclose information which the individual believes, shows malpractice or wrongdoing which could affect the business or reputation of the Company and any allegation that fall within the scope of the concerns identified are investigated and dealt with appropriately. This policy provides adequate safeguards against victimization of any individual who avail of vigil mechanism.

The Company promotes ethical behaviour in all its business activities and in line with the best governance practices, The Company has established a system through which employees and business associates may report unethical business practices at work place without fear of reprisal. The Company has set up a direct touch initiative, under which all employees / business associates have direct access to the Chairman of the Audit Committee. The Whistle-Blower Protection Policy aims to:

- Build and strengthen a culture of transparency and trust.
- Ensure timely and consistent organizational response.
- Allow and encourage employees and business associates to bring to the Management notice concerns about unethical behavior, malpractice, wrongful conduct, actual or suspected fraud or violation of policies.
- Provide protection against victimization.

The above mechanism has been appropriately communicated within the Company across all levels and has been displayed on the Company's website www.suryaindialtd.com. The Audit Committee periodically reviews the existence and functioning of the mechanism. It reviews the status of complaints received under this policy on a quarterly basis.

