

Whistle Blower and Vigil Mechanism

The Company has established a vigil mechanism to report concerns about unethical behavior, actual/ suspected frauds and violation of Company's Code of Conduct or Ethics Policy. Protected disclosures can be made by a whistle blower through several channels. The Audit Committee of the Board oversees the functioning of Vigil Mechanism in accordance with the provisions of the Companies Act, 2013 and the Listing Agreement. The said Mechanism is established for directors and employees to report their concerns.

Procedure:

All Protected Disclosures concerning financial/accounting matters should be addressed to the Chairman of the Audit Committee of the Company for investigation. Where any unethical behavior, actual/ suspected fraud and violation of Company's Code of Conduct or Ethics Policy is noticed by any employee, director or by the audit committee on its own, may reported to the Chairman of the Audit committee.

The contact details of the Chairman of the Audit Committee:

Mr. Sameep Shah,
Chairman – Audit Committee of Directors
Office: DE- 8082 Bharat Diamond Bourse, Bandra-
Kurla Complex, Bandra (East), Mumbai 400051.

Protection to Whistleblower:

No unfair treatment will be meted out to a Whistleblower by virtue of his/her having reported a disclosure/ fraud under this mechanism. The Company condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistleblowers. Complete protection will, therefore, be given to Whistleblowers 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 or indirect use of authority to obstruct the Whistleblower's right to continue to perform his/her duties/functions including making further disclosure/ reporting of fraud. The Company will take steps to minimize difficulties, which the Whistleblower may experience as a result of making the disclosure/ reporting the fraud. Thus, if the Whistleblower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistleblower to receive advice about the procedure, etc.

Investigation and Decision:

All Protected Disclosures reported under this Policy will be thoroughly investigated by the Chairman of the Audit Committee of the Company, with the guidance of the members of the Audit committee, who will investigate / oversee the investigations under the authorization of the Audit Committee. If any member of the Audit Committee has a conflict of interest in any given case, then he/she should recuse himself/herself and the other members of the Audit Committee should deal with the matter on hand.

If an investigation leads the Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the Chairman of the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as the Chairman of the Audit Committee deems fit. It is clarified that any disciplinary or corrective action initiated, against the person who was involved in such fraud/ violation, as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures

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