

Rashi Peripherals Vigilance 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.

The Company has promoted the vigil mechanism to provide a framework for the company's employees and Directors to report genuine concerns and promote responsible and secure whistle blowing. The purpose of the policy is to provide adequate safeguards against victimization of Directors and employees who avail the vigil mechanism.

As per Section 177 (9) of the Companies Act, 2013 read with rule 7 of the Companies (Meetings of Board and its Powers) Rules 2014 provide that the unlisted company which has borrowed money from Banks and public institutions in excess of Rupees Fifty crores have to establish a vigil mechanism for directors and employees to report their grievances.

The policy covers the disclosure of any unethical and improper or malpractices and events which have taken place and which includes 1) Financials frauds and irregularities 2) Breach of Business ethics and integrity 3) Abuse of authority 4) Unethical behavior 5) Breach of terms and conditions of employment and rules thereof 6) Any type of Fraud or corruption 7) Manipulation of Company's data 8) Pilferage of confidentiality 9) Wastage or misappropriation of Company's Money/assets 10) Any other dishonest or unethical act causing damage to the Company or its assets.

Procedure

All protected Disclosure should be reported in writing by the complainant as soon as possible after the whistle blower becomes aware of the same and should be written in the English language.

All the disclosures should be addressed to the nominated Director.
The contact details of the Nominated Director are as under:

Name - Mr. Kapal Pansari.

Address:- 5th floor, Ariisto House,
Telli Galli, Andheri (East),
Mumbai – 400069

Email - director@rptechindia.com

Protected Disclosure against the Nominated Director should be addressed to the Chairman of the Company and the Protected Disclosure against the Chairman of the Company should be addressed to the Nominated Director.

The contact details of the Chairman are as under:

Name - Mr. Krishna Kumar Choudhary.

Address:- 5th floor, Ariisto House,
Telli Galli, Andheri (East),
Mumbai – 400069

Email -chairman@rptechindia.com

On receipt of the protected disclosure the Nominated Director shall make a record of the Protected Disclosure and also ascertain from the complainant whether he/she was the person who made the protected disclosure or not. He shall also carry out initial investigation either by himself or by involving any other Officer of the Company or an outside agency before referring the matter to the Chairman of the Company for further appropriate investigation and needful action and will make a detailed written record of the protected disclosure.

The nominated Director will finalize and submit the report to the chairman within 15 days.

On submission of the report the chairman either 1) in case the protected disclosure is proved, accept the findings of the nominated Director and take such disciplinary action as he may think fit and take preventive measure 2) in case the protected disclosure is not proved, dismiss the matter

In case the nominee Director is having any conflict of interest with the matter, he should disclose the same and should not deal with the matter and the matter will be dealt by the Chairman of the Company.

The Protected Disclosures against the nominated Director and the Chairman of the company will be placed before the Board of Directors of the company by the Chairman and the nominated Director respectively and the Board will dispose of the same and take suitable action in its meeting.

All the protected disclosures in writing or documented which have been proved shall be retained by the company for a minimum period of 3 years. Other protected disclosures may be destroyed at the end of the financial year.

The company reserves the rights to modify this policy in whole or in part at any time without assigning any reason.