



POLYLINK POLYMERS (INDIA) LIMITED
(CIN: L17299GJ1993PLC032905)

WHISTLE BLOWER POLICY/ VIGIL MECHANISM

(Approved on 06.02.2026)



PREFACE

Pursuant to Section 177(9) and 177(10) of the Companies act, 2013 read with Regulation 22 of the SEBI (Listing Obligation and disclosure Requirements) Regulations, 2015 the Whistle Blower/ Vigil Mechanism Policy is formulated to provide a mechanism for directors and employees to report genuine concerns about unethical behavior, actual or suspected fraud, violation of laws, or improper conduct; Ensure direct access to the Chairperson of the Audit Committee in appropriate or exceptional cases; Provide adequate safeguards against victimization of persons who avail the vigil mechanism; and Promote a culture of transparency, accountability, and ethical conduct within the Company.

1. Objective

The Company is committed to conduct its business with the highest standards of integrity, ethical behaviour, transparency and accountability, in compliance with the applicable provisions of the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Whistle Blower/ Vigil Mechanism Policy provides for adequate safeguards against victimisation of Directors and employees who avail of the mechanism and also ensures direct access to the Chairman of the Audit Committee in appropriate or exceptional cases, in order to facilitate prompt and impartial review and resolution of reported matters.

2. Applicability

This policy applies to all the Directors including Independent Directors and all permanent employees of the Company.

3. Definitions

- i. **“Company”** means Polylink Polymers (India) Limited.
- ii. **“Audit Committee”** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013.
- iii. **“Chairman”** means chairman of the Audit Committee constituted by the Board of Directors of the Company.
- iv. **“Employee”** means every bona fide employee currently in the employment of the Company and includes contractual employees, support staff and Directors of the Company.



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- v. **“Unethical Activity”** means any activity by an employee of the Company that is undertaken in performance of his or her official duty, whether or not that act is within the scope of his or her employment, and that is in violation of any law or the rules of conduct applicable to the employee, including but not limited to abuse of authority, breach of contract, manipulation of company data, pilferage of confidential / proprietary information, criminal offence, corruption, bribery, theft, conversion or misuse of the Company’s property, fraudulent claim, fraud or willful omission to perform the duty, or that is economically wasteful or involving gross misconduct, incompetence or gross inefficiency and any other unethical biased favored or imprudent act.
- vi. **“Investigator”** means the person(s) authorized, appointed, consulted, or approached by the Whistleblower Complaints Committee/ Chairman.
- vii. **“Protected Disclosure”** means a concern raised by a written communication made in good faith that discloses or demonstrates information related to Unethical Activity.
- viii. **“Subject”** means a person against or in relation to whom a Protected Disclosure is made or evidence gathered during an investigation.
- ix. **“Whistleblower”** means an Employee who makes a Protected Disclosure under this policy. He is a reporting party and is not an investigator. Although the Whistleblower is not expected to prove the truth of an allegation, he needs to demonstrate to the Whistleblower Complaints Committee, that there are sufficient grounds for concern and expected to provide the complete details/ evidence in his possession.
- x. **“Whistleblower Complaints Committee / WCC”** means the Committee constituted by the Company from time to time comprising Chairperson of the Audit Committee and members of Senior Management. The Committee shall oversee the functioning of the whistleblower mechanism and be responsible to handle and manage Protected Disclosures.

4. Scope of Policy

This Policy shall cover:

- a) Serious complaints that could have grave impact on the operations and performance of the Company.
- b) Address the concern of employees relating to any wrongdoing within the Company, enabling them to report suspected occurrence(s) of illegal, unethical or inappropriate actions or behaviors.
- c) Receipt of information about corruption, malpractice or misconduct on the part of employees, from whatever source.



The Policy intends to cover the following type of complaints:

- a) Fraudulent activities or activities involving suspected fraud.
- b) Illegal activities.
- c) Corruption and deception.
- d) Misuse/abuse of authority.
- e) Violation of Company's rule, manipulations, and negligence.
- f) Questionable accounting practices including misappropriation of money.
- g) Intentional or deliberate non-compliance of laws, regulations and policies.
- h) Wastage/misappropriation of Company's funds/assets.
- i) Violation of code of conduct of the Company.
- j) Instance of leak of Unpublished Price Sensitive Information (UPSI) as defined under SEBI PIT Regulations.
- k) Any fraud in preparation of financial statements of the Company.
- l) Criminal offences committed or likely to be committed that may implicate the Company or otherwise adversely affect the reputation of the Company.

The Following nature of complaints shall not be covered in the Policy

- a) Complaint which are frivolous in nature.
- b) Complaints related to personal in nature such as increment, promotion etc.
- c) Sexual Harassment as it is covered under different policy of the Company.

The aforesaid list is illustrative in nature and not an exhaustive list.

5. Safeguards

Any employee who makes a Protected Disclosure or raises a concern under the Policy will be protected, if the employee:

- Discloses the information in good faith,
- Believes it to be substantially true, and
- Does not act maliciously nor makes false allegations.

While it will be ensured that genuine Whistleblowers have been given complete immunity from any kind of unfair treatment, any abuse of this protection is strictly prohibited. Any attempt on the part of any employee to misuse the Policy for personal advantage shall be dealt with strictly by the Company.

6. Reporting of a Concern/ Complaint:

- a. The Company has created dedicated email IDs for reporting cases under the Policy. All Protected Disclosures need to be made in writing on these dedicated email IDs. Additional modes of communication or access would be available to employees in appropriate or exceptional situations.



- b. All Protected Disclosures should be addressed to WCC at polylink@polylinkpolymers.com.
- c. If a Protected Disclosure is received by any executive of the Company other than WCC or Chairman, the same should be forwarded either to WCC or the Chairman, as the case may be. Due care must be taken to keep the identity of the Whistleblower confidential.
- d. Protected Disclosures should be factual rather than speculative or conclusory and should contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedure.
- e. Whistleblower must reveal his proper identity (name, employee id etc.) while raising such complaint and as follow-up questions. Investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will not be usually investigated but subject to the seriousness of the issue raised, WCC may at its sole discretion initiate an investigation. However, in such cases it may not be possible to interview the Whistleblower and grant him protection under the Policy.

7. Investigation:

- a) The Protected Disclosures received at polylink@polylinkpolymers.com shall be placed before WCC for necessary action, including investigation, as required. Protected Disclosures reported under this Policy will be thoroughly investigated by WCC/ Chairman, as deemed necessary.
- b) If initial enquiries by WCC/ Chairman indicate that the concern has no basis, it may be dismissed at this stage.
- c) In case the concern does not fall within the ambit of the Policy, the sender shall be informed that the concern is being forwarded to the appropriate department/ authority for further action, as deemed necessary.
- d) Where initial enquiries indicate that further investigation is necessary, this will be carried through by WCC/ Chairman. The WCC/ Chairman may at its discretion, consider involving Investigator for the purpose.
- e) The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt.
- f) The identity of a Subject will be maintained confidential to the extent possible given the legitimate needs of law and the investigation.



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- g) Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for input during the investigation.
 - h) Subjects have a duty to co-operate with WCC/ Investigators/ Chairman during investigation to the extent that their co-operation will not compromise self-incrimination protections available under the applicable laws.
 - i) Subjects have a right to consult with a person or persons of their choice, save and except the WCC/ Investigators/ Chairman.
 - j) Subjects have a responsibility not to interfere with the investigation and to adhere to admonitions from the investigators in this regard. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated.
 - k) Unless there are compelling reasons not to do so, Subjects will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.
 - l) Subjects have a right to be informed of the outcome of the investigation. If allegations are not sustained, the subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the company and the subject.
 - m) The investigation shall be completed as expeditiously as possible but shall not exceed 90 days from the receipt of the Protected Disclosure.

8. Protection

a. No discrimination, harassment, victimization or any other unfair employment practice like retaliations, threat or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or like will be adopted against Whistle Blowers.

b. A whistle Blower may report any violation of the above clause to the WCC/ Chairman of the Audit Committee, who shall investigate into the same and recommend suitable action to the management/Board of Directors which may inter alia include.

- i.** Reinstatement of the employee and director to the position or to an equivalent position.
- ii.** Order for compensation for lost remuneration or any other benefits.



9. Decision:

If an investigation leads the WCC/ Chairman to conclude that an improper or unethical act has probably been committed, they will recommend disciplinary or corrective action as they deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the Code of Conduct and other applicable policies of the Company.

10. Reporting:

The WCC shall submit a report to the Audit Committee at a regular interval about all Protected Disclosures received since the last report together with the results of investigations, if any.

Details of establishment of whistleblower mechanism and an affirmation that no personnel have been denied access to the Audit Committee shall be included in the Directors' Report of the Company.

This Policy shall be communicated to all concerned and also uploaded on website of the Company.

11. Anonymous Allegations

This policy requires individuals to put their name to any disclosures they make.

12. Confidentiality

The Company will treat all such disclosures in a sensitive manner and will endeavor to keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.

13. Untrue / Malicious / Vexations Allegations.

If an individual makes an allegation, which is not confirmed by subsequent events, and the investigation shows that an individual has made malicious or vexatious allegations for personal leverage, and particularly if he or she persists with making them, disciplinary action may be taken against the individual concerned.

14. Notification

All departmental heads are required to notify and communicate the existence and contents of this policy to the employees of their department. The new employees shall be informed about the policy by the Personnel & Administration department and Director shall be informed about the policy by the Secretarial Deptt. This policy as amended from time to time shall be made available on the Website of the Company.



15. The contact details of the Committee of Whistle Blowers and the Chairman of the Audit Committee are as follows:-

a.	The Chairman, Whistle Blower Committee, Polylink Polymers (India) Ltd. 506, Saffron Building, Nr. Center Point, Ambawadi, Ahmedabad-380006 079-26427800	polylink@polylinkpolymers.com
b.	The Chairman, Audit Committee, Polylink Polymers (India) Ltd. 506, Saffron Building, Nr. Center Point, Ambawadi, Ahmedabad-380006 079-26427800	polylink@polylinkpolymers.com