



Baid Leasing and Finance Co. Ltd.

Regd. Office: "Baid House", 2nd Floor, 1-Tara Nagar, Ajmer Road, Jaipur-06 Ph:9214018855
E-mail: baidfinance@baidgroup.in Website: www.balfc.com CIN: L65910RJ1991PLC006391

WHISTLER BLOWER POLICY / VIGIL MECHANISM OF THE COMPANY:

Our Whistle Blower Policy encourages disclosure in good faith of any wrongful conduct on a matter of general concern and protects the whistle blower from any adverse personnel action.

I] Preface & Objectives:

Baid Leasing and Finance Co. Ltd. believes in the policy of ethical and lawful business conduct and as part of this policy strives to carry on its business activities in fair, transparent and professional manner. The Company has continuously strived for developing an environment which would be safe for its employees.

- This Whistler Blower Policy / Vigil Mechanism (mechanism) is formulated for securing / reporting / deterring / punishing / rectifying any unethical, unlawful acts, behaviour etc. and to enable to voice/ address bonafide concern of malpractice, deviation from the policies of the Company internally in an effective and systematic manner after its discovery.
- The employees of the Company have a basic responsibility to make the management aware of any non adherence of the mechanism.
- This mechanism is in accordance with the requirements of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Section 177 of the Companies Act, 2013 and rules made there under. Any future amendments to the said Act / rules will necessitate amendment of this policy to be in tandem with the prevailing statute.

II] Definitions:

- Company means **Baid Leasing and Finance Co. Ltd.**
 - **Designated officer** means Chairman of the Audit Committee or such other officer of the Company who shall be expressly designated for the purpose of this mechanism.
 - **Disciplinary Action** means warning, imposition of fine, suspension from official duties or such other action that may be decided by the Audit Committee depending on the gravity of the matter.
 - **'Disclosure'** means reporting of malpractice done by an 'Individual' under and as per this mechanism.
 - **'Individual'** means the person who makes disclosure under this mechanism.
 - **'Wrongdoer'** means person against whom disclosure of malpractice is made by an individual.

III] Applicability:

- This mechanism shall, in relation to the Company, apply to all the:
 - i. Directors,
 - ii. Employees,



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- iii. Trainees,
- iv. Any other persons as may be decided by the Board of Directors of the Company.

IV] **Coverage:**

- The following activities, events may be brought to the notice of the designated officer:
 - i. Violation of Code of Conduct of the Company.
 - ii. Unethical, immoral, biased conduct or behaviour.
 - iii. Abuse of the power or the authority given.
 - iv. Breach of contract.
 - v. Tampering or manipulating any record and data of the Company.
 - vi. Any activity, malpractice or wrongdoing which may be harmful for the persons working in or for the Company or for the Company's image.
 - vii. Financial irregularities and any type of fraud.
 - viii. Misappropriation of the Company's funds.
 - ix. Any activity which is criminal and illegal in nature.
 - x. Negligence, lapse causing harm to environment or health, safety of the employees of the Company or public.
 - xi. Concealment of above activities.
 - xii. Such other issues as may be prescribed by the Audit Committee.

V] **Procedure to be followed under this mechanism:**

1) Disclosure:

- Any person may disclose, preferably in writing the following:
 - i) Brief details of the malpractice found or discovered,
 - ii) Name of the alleged wrongdoer,
 - iii) Evidence, if any, to support the allegation,
 - iv) Remedial actions required to be taken,
 - v) Any other relevant details.

The disclosure may be made within 30 days of being aware of the event to the designated officer of the Company. The time limit of 30 days may be extended at the discretion of the designated officer, after considering the circumstances.

- The personal making the said disclosure may disclose his / her identity to the designated officer. The identity of the person reporting the malpractice will be kept confidential if the same is provided with a condition to keep it anonymous.

- The Disclosures shall be made to the following designated officer: Name: Aman Baid
Designation: Director

Note: In exceptional cases, the person making the disclosure can have direct access to the Chairperson of the Audit Committee of the Company.