

**SATYAM PROJECTS LIMITED**

**VIGIL MECHANISM  
AND  
WHISTLE-BLOWER  
POLICY**

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## **1. Objective**

This Policy is established in accordance with Section 177 of the Companies Act, 2013 and SEBI (LODR) Regulations to provide a mechanism for directors and employees to report genuine concerns about unethical behavior, fraud, or violation of laws or the Company's Code of Conduct.

## **2. Applicability**

This Policy applies to all directors and employees of Satyam Projects Limited.

## **3. Reportable Matters**

Concerns relating to:

- Fraud, financial irregularities, or misappropriation
- Corruption, bribery, or unethical conduct
- Violation of laws, regulations, or Code of Conduct

(Personal grievances are excluded.)

## **4. Reporting Mechanism**

Concerns may be reported in good faith through email: [satyam\\_projects@yahoo.com](mailto:satyam_projects@yahoo.com)

In exceptional cases, concerns may be reported directly to the Chairperson of the Audit Committee.

## **5. Protection to Whistle-blower**

- No retaliation or victimization for reporting in good faith
- Identity of the Whistle-blower will be kept confidential

## **6. Investigation**

All complaints will be reviewed by the Audit Committee or designated authority and investigated appropriately.

## **7. False Complaints**

Knowingly false or malicious complaints may result in disciplinary action.

## **8. Review**

This Policy shall be reviewed periodically in line with applicable laws and regulations.