

Advance Petrochemicals Limited  
(CIN: L67120GJ1994PLC023803)

Vigil Mechanism & Whistle Blower

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## INTRODUCTION:

Section 177 of the Companies Act, 2013 requires every listed company and such class or classes of companies, as may be prescribed to establish a vigil mechanism for the directors and employees to report genuine concerns in such manner as may be prescribed.

## POLICY FORMULATION

In compliance of the above requirements, Advance Petrochemicals Limited (APCL), being a Listed Company has established a Vigil (Whistle Blower) Mechanism and formulated a Policy in order to provide a framework for responsible and secure whistle blowing/vigil mechanism.

## POLICY OBJECTIVES

Advance Petrochemicals Limited (APCL) believe in conducting its affairs in fair and transparent manner including in accordance with all applicable laws and regulations.

The Company is committed to develop a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct.

## TERMS OF REFERENCE

In this Policy, the following terms shall have the following meanings:

**“Audit Committee”** means the committee constituted by Advance Petrochemicals Limited (APCL) in accordance with Section 177 of the Companies Act, 2013, which has responsibility for supervising the development and implementation of this Policy.

**“Employee”** means any employee or director of Advance Petrochemicals Limited (APCL)

**“Vigilance Officer / Vigilance Committee or Committee”** means a person or committee of persons nominated/ appointed to receive protected disclosure from whistle blowers, maintaining records thereof, placing the same before Audit Committee for its disposal and informing the whistle blower the result thereof.

**“Protected Disclosure”** means a written communication of a factual concern made in good faith which discloses or demonstrate information that may evidence unethical or improper activity.

**“Subject”** means a person against or in relation to whom a protected disclosure is made or evidence gathered during the course of an Investigation.

**“Whistle-blower”** means any Employee who makes a Protected Disclosure under this Policy.

## SCOPE AND EXCLUSION

This Vigil Mechanism and Whistle-blower Policy sets out the procedure to be followed while making a disclosure.

This Policy applies to all Employees and directors of the Company and violations will result in appropriate disciplinary action.

## PROCEDURE

All Protected Disclosures should be reported to the Vigilance Officer or to the Chairman of the Audit Committee in exceptional cases in writing by the complainant as soon as possible, not later than 30 days after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English under a covering letter signed by the complainant in a closed and secured envelope and should be super scribed as "Protected disclosure under the Whistle Blower policy" or sent through email with the subject "Protected disclosure under the Whistle Blower policy". If the complaint is not super scribed and closed as mentioned above, the protected disclosure will be dealt with as if a normal disclosure.

The contact details of the Vigilance Officer are as under:-

**Name and Address** –Mr. Natraj Arli - CFO  
Advance Petrochemicals Ltd.  
36, Kothari Market,  
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Ahmedabad: 380022  
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In order to protect the identity of the complainant, the Vigilance Officer will not issue any acknowledgement to the complainants and they are not advised neither to write their name / address on the envelope nor enter into any further correspondence with the Vigilance Officer.

Anonymous / Pseudonymous disclosure shall not be entertained by the Vigilance Officer.

On receipt of the protected disclosure the Vigilance Officer shall detach the covering letter bearing the identity of the Whistle Blower and process only the Protected Disclosure.

## INVESTIGATION

All Protected Disclosures under this policy will be recorded and thoroughly investigated.

The Vigilance Officer will carry out an investigation either himself/herself or by involving any other Officer of the Company/ Committee constituted for the same /an outside agency before referring the matter to the Audit Committee of the Company.

The Audit Committee, if deems fit, may call for further information or particulars from the complainant and at its discretion, consider involving any other/additional Officer of the Company and/or Committee and/ or an outside agency for the purpose of investigation.

The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact finding process.