



# WHISTLE BLOWER POLICY OF ASIA PACK LIMITED

## **Background:**

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”). The Regulations come into force from December 1, 2015. The Regulations mandate listed entities to formulate an archival policy. It is in this context that the Policy on Archival of Documents (“Policy”) is being framed and implemented.

## **Objective of the Policy:**

The objective of this Policy is to comply with Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as mentioned below:

*“The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.”*

## **Archival Policy:**

The Company shall disclose events and information to the Stock Exchanges in line with the Company’s Policy on determination of Materiality of Events and as per the Regulations, and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of documents.

## **Policy Review:**

This Policy shall be subject to review as may be deemed necessary and in accordance with any regulatory amendments.

## **Website:**

This Policy shall be disclosed on the website of the Company.

## **Disclaimer:**

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.