

**VIGIL MECHANISM/WHISTLER BLOWER
STAR DELTA TRANSFORMERS LIMITED**

The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. Also, 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.

Section 177 read with Rule 7 of The Companies (Meetings of Board and its Powers), 2014 and revised Clause 49 of the Listing Agreement , inter-alia, provides, a mandatory requirement, for all listed companies to establish a mechanism called "Vigil Mechanism(Whistle Blower Policy)" for directors and employees to report concerns about unethical behaviour, actual or suspected fraud or violation of the Company's code of conduct or ethics policy.

The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects directors and employees wishing to raise a concern about serious irregularities within the Company.

The mechanism provides for adequate safeguards against victimization of Directors/employees who avail the mechanism and also provide direct access to the Chairman of the Audit Committee in exceptional cases.

The Company has established Vigil Mechanism/ Whistle blower Policy which will be overseen by the Audit Committee.

SAMPLE FORMAT FOR WHISTLE BLOWING

Date	:	
Name of the Employee/Director	:	
E- mail id of the employee/Director	:	
Communication Address	:	
Contact No	:	
Subject matter which is reported	:	
(Name of the person/ event focused at)	:	
Brief about the concern	:	
Evidence (enclose, if any)	:	

Signature

By & on behalf of:
Kishore Gupta
Managing Director
Star Delta Transformers Limited