



Adcon Capital Services Limited

CODE OF CONDUCT FOR WHISTLE BLOWER POLICY

Policy Title	Whistle Blower Policy
Authorised by	Board of Directors

The Whistleblower Policy is applicable to all employees and/ or Directors of Adcon Capital Services Limited ("the Company") and any other persons as may be decided by the Board of Directors of the Company.

1. OVERVIEW

1.1. Objectives

The Whistleblower Policy allows you to raise concerns about unacceptable, improper or unethical practices being followed in the organization, without necessarily informing your superior. You will be protected against any adverse action and/ or discrimination as a result of such a reporting, provided it is justified and made in good faith.

1.2. Applicability

The Whistleblower Policy is applicable to all employees and/ or Directors of Adcon Capital Services Limited.

2. WHISTLEBLOWER POLICY

2.1. Issues governed by this policy

Under this policy, you may raise concerns about unacceptable, improper or unethical practices being followed in the Company, without necessarily informing your superior.

2.2. Safeguarding your interests

You will be protected against any adverse action and/ or discrimination as a result of a reporting under this policy, provided it is justified and made in good faith. The issues raised could include:

- Reporting in good faith, your belief that there is waste of organization funds;
- Reporting in good faith the violation or suspected violation of a law, rule or regulation;



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Adcon Capital Services Limited

- Participating in or giving information in an investigation, hearing, court proceeding, legislative or other inquiry or other administrative review;
- Objecting or refusing to carry out a directive that you believe in good faith, may violate a law, rule or regulation.

The organization is forbidden from taking any adverse action against you for exercising your rights as listed above. Adverse action is defined as:

- Threatening you;
- Discharging you;
- Discriminating against your employment.

2.3. Lodging a complaint

If you have a genuine complaint or concern about any fraud or violation of a law, rule or regulation or unacceptable, improper or unethical practice, you may raise this with your superior or Chairman of the Audit Committee. The complaint should be made within 30 days of being aware of the event. The time limit of 30 days may be extended at the discretion of the Chairman of the Audit Committee.

2.4. Audit Committee

You are free to communicate your complaints directly to the Chairperson of the Audit Committee.

The Chairperson of the Audit Committee can be contacted at:

Name: Mr. Mihir H. Patel

Email ID: mihirpatel100@gmail.com

He is responsible for the following:

- To receive and record any complaints under this policy.
- To ensure confidentiality of any whistleblowing complainant who requests that the complaint be treated in confidence.
- To prepare a report of any whistle blowing complaint and submit the report.
- To communicate the decision of the Audit Committee to the complainant.

3. Amendment

The Company reserves its rights to amend or modify this Policy in whole or in part at any time without assigning any reason whatsoever.

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