PYRAMID

PYRAMID INFRATECH PRIVATE LIMITED

"Vigil Mechanism / Whistle Blower Policy"

PYRAMID INFRATECH PVT. LTD.
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1. Preface

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

This policy provides a framework to enable employees, directors, and other stakeholders to report unethical behavior, actual or suspected fraud, or violation of the Company's Code of Conduct.

2. Objective

The objectives of this policy are:

a) To provide a mechanism for employees, directors, and stakeholders to raise concerns about unethical behavior, fraud, or violation of legal/regulatory requirements.
b) To ensure adequate safeguards against victimization of whistle blowers.
c) To ensure a fair and transparent investigation of reported matters.

3. Applicability

This policy applies to all directors, employees, and other stakeholders of the Company.

4. Definitions

a) "Whistle Blower" means a director, employee, or stakeholder making a disclosure under this Policy.
b) "Protected Disclosure" means any communication regarding unethical practices, fraud, violation of law, or breach of the Company's Code of Conduct.
c) "Audit Committee" means the committee constituted by the Board of Directors of Pyramid Infratech Private Limited in accordance with Section 177 of the Companies Act 2013, which has responsibility for supervising the development and implementation of this Policy.
d) "Code of Conduct" means the Code of Business Conduct and Ethics.
e) "Employee" means any employee or director of the company.
f) "Executive Committee (EC)" means the committee set up by the Managing Director to assist him in discharging his executive management delegations from the Board.
g) "Ethics & Compliance Task Force" (ECTF) means the committee designated by the Audit Committee to handle complaints and the resolution process of Protected Disclosures,

5. Scope of the Policy

The policy covers malpractices and events which have taken place/suspected to take place involving:

a) Breach of Company's policies or Code of Conduct
b) Manipulation of Company records/data
c) Financial irregularities or fraud
d) Misuse of Company's assets

e) Any unlawful act whether civil or criminal
f) Any act detrimental to the interest of the Company

6. Procedure

A Whistle Blower can make a protected disclosure in writing by letter/email addressed to the Vigilance Officer / Compliance Officer / Audit Committee (if applicable) of the Company.

The disclosure should be made with adequate details and supporting evidence, wherever possible.

Anonymous disclosures may not be entertained.

7. Investigation

The Vigilance Officer shall acknowledge receipt and conduct a preliminary review of the disclosure.

If the matter is found to be genuine, a formal investigation shall be conducted.

A report of the investigation shall be prepared and submitted to the Board / Audit Committee (if applicable).

8. Protection

The Company assures that no Whistle Blower shall be subject to any victimization, retaliation, or discrimination for making a disclosure in good faith.

Any abuse of this protection by knowingly making false complaints shall result in disciplinary action.

9. Confidentiality

All disclosures and the identity of the Whistle Blower shall be kept confidential to the extent possible, consistent with the need for proper investigation.

10. Decision & Reporting

Based on the investigation report, appropriate disciplinary or corrective action shall be taken by the Company.

11. Review of Policy

The Board of Directors of the Company shall periodically review and may amend this policy as required.

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