



Jackson Commercial Private Limited

# Vigil Mechanism / Whistle Blower Policy

Purpose	To create a fearless and transparent environment for the employees / various stakeholders
Version	FY-2025-26/1.0
Author	Secretarial Department
Policy Approval	Board of Directors
Policy Renewal Date	08-05-2025

## JACKON COMMERCIAL PRIVATE LIMITED

**Registered Office: 35J, Ground Floor, Radha Madhav Dutta Garden Lane,  
Kolkata - 700010, West Bengal, India  
(CIN: U65100WB1996PTC080884)**



Jackson Commercial Private Limited

## **1. Introduction**

Jackson Commercial Private Limited (hereinafter referred to as 'JCPL') believes in conducting all of its affairs in a fair and transparent manner by adopting the highest standards of honesty, professionalism, integrity and ethical behavior. JCPL has always committed to develop a culture where it is safe for any person to raise concerns about any poor/ unacceptable practice prevalent or any event of unethical or misconduct in the course of business activities of the JCPL.

## **2. Applicability**

This policy is applicable to all the employees of the JCPL working out of the Corporate Office, Regional and Branch offices, Directors, Customers, Shareholders, Vendors, Suppliers or Agencies and other stakeholders of the JCPL.

A copy of the policy shall be displayed by all the Branches and Offices at a prominent place inside the premises where the general public and customers frequently visited as well as the website of the JCPL.

## **3. Objective of the Policy**

JCPL is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain this standard in letter and spirit, the Company encourages its employees to come forward and express their concerns about the suspected misconduct without any fear of punishment or unfair treatment. This policy provides a channel to the employees and directors to express their concerns to the management about unethical behavior, actual or suspected or probable fraud or violation of the Codes of conduct or legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

## **4. Scope of the Policy**

This policy intends to cover all malpractices and events that have taken place or suspected to have taken place that could have grave impact on the operations and performance of the business of the Company are follows:

- Breach of applicable code of Conduct
- Breach of Business Integrity and Ethics
- Breach of Contract
  - Intentional or Deliberate non-compliance or violation of any law or regulations, policies including not limited to corruption, bribery, theft, fraud, coercion and willful omission.
  - Fraudulent activities including fraud or suspected fraud
  - Pilferage of confidential/proprietary information
  - Manipulation of Company's data/records
  - Abuse/Misuse of Authority or fraud.
  - Any other unethical, biased or imprudent deed or behavior

## 5. Definitions

1. Employee: means every employee of the JCPL including the Directors in employment of the JCPL.
2. Directors: means a Director on the Board of Directors of the JCPL, whether whole time or otherwise.
3. Protected Disclosure: means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity with respect to the JCPL. Protected Disclosures should be factual not speculative in nature.
4. Subject: means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.
5. Whistle Blower: means an employee, Directors, customer, or any other stakeholders to whom this policy is applicable and who makes a Protected Disclosure under this Policy.
6. Whistle and Ethics Officer: means an officer of the Company designated by the Competent Authority to conduct detailed investigation under this policy and to receive protected disclosure from Whistle Blowers, maintain record thereof, placing the same before Board of Directors for its disposal and informing the Whistle Blower the result thereof.
7. Company: means 'Jackson Commercial Private Limited'

## 6. Eligibility

All employees of the Company and various stakeholders of the Company are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company.

## 7. Receipt and Disposal of Protected Disclosures

1. All the Protected Disclosures should be reported in writing and submitted in a closed envelope and should be super scribed as "Protected Disclosure under the Whistle Blower Policy". The same can be sent through email with the subject "Protected Disclosure under the Whistle Blower Policy". The Whistle Blower must put his/her name and contact details in the Protected Disclosures. The Whistle and Ethics Officer shall make it assured that in case any further clarification is required he will get in touch with the complainant.
2. The Company shall consider anonymous/pseudonymous disclosures.
3. The Protected Disclosures should be forwarded in a cover letter signed by the complainant and all Protected Disclosures should be addressed to the Whistle and Ethics Officer or to the Chairman of the Board of Directors in exceptional cases, the contact details are as under:



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**Name and address of the Whistle and Ethics Officer:**

Mr. Tuhin Karmakar, Director,  
Jackson Commercial Private Limited,  
35J, Ground Floor, Radha Madhav Dutta Garden Lane, Kolkata, 700010, West Bengal, India.  
Email: tuhin.tuhin.karmakar2@gmail.com

4. Protected Disclosures against the Whistle and Ethics Officer should be addressed to the Director and the Protected Disclosures against the Director should be addressed to the Chairman of the Board of Directors.

**Name and address of Director of the Company**

Mr. Kartick Biswas, Director  
Jackson Commercial Private Limited,  
35J, Ground Floor, Radha Madhav Dutta Garden Lane, Kolkata, 700010, West Bengal, India.  
Email: kartick.biswas@yahoo.com.

5. On receipt of the Protected Disclosures the Whistle and Ethics Officer / Director / Chairman of the Board of Directors, as the case may be, shall make a record of the Protected Disclosures and will do a preliminary investigation to check whether the complaint is seems to be genuine and falls under the purview of the whistle blower policy. If the complaint is sent with malicious intent, then the officer/ committee will take appropriate action against the whistle blower. The record will include:

- i) Brief facts;
- ii) Whether the same Protected Disclosures raised previously on the same subject and if so, the outcome thereof;
- iii) Details of action taken by Whistle and Ethics Officer / Director / Chairman of the Board of Directors, for processing the Protected Disclosures.
- iv) Findings/recommendations of the Whistle and Ethics Officer/ Managing Director / Chairman of the Board of Directors/other action(s).
- v) Whistle and Ethics Officer / Director / Chairman of the Board of Directors, may call for further information or particulars from the Whistle Blower.

**8. Investigation and Report**

1. All Protected Disclosures reported under this Policy will be thoroughly investigated by the Whistle and Ethics Officer of JCPL who will investigate/oversee the investigations under the authorization of the Chairman of the Audit Committee.

2. The Chairman of the Board of Directors may at their discretion consider any investigation or investigating agency for the purpose of investigation.

3. The decision to conduct an investigation into Protected Disclosures by itself is not an acceptance of the accusation by the Authority. It is to be treated as a neutral fact finding process because the outcome of the investigation may or may not support accusation, unless there are compelling reasons not to do so.

4. Subject(s) will be given reasonable opportunity for hearing their side during the investigation. No allegation of wrongdoing against a subject shall be considered as maintainable unless there is good evidence in support of the allegation.

5. The Subject(s) shall have the right to access any document/information for their legitimate need to clarify / defend themselves in the investigation proceedings.

6. The Subject(s) shall have a duty to co-operate with Whistle and Ethics Officer / Board of Directors, during investigation to the extent that such cooperation will not compromise self-incrimination protections available under the applicable laws.

7. The Subject(s) are expected to cooperate with the investigator and not interfere or obstruct with the investigation process.

8. The Subject(s) shall have a right to be informed of the outcome of the investigation. If allegations are not sustained, the subject shall be consulted as to whether public disclosures of the investigation result would be in the best interest of Subject and the Company.

9. Whistle and Ethics Officer shall normally complete the investigation within 90 days of the receipt of protected disclosure. If the investigation cannot be completed within 90 days, then the officer needs to have valid and strong reasons for the same.

10. In case allegations against the Subject are substantiated by the Whistle and Ethics Officer in his report, the Board of Directors, shall give an opportunity to Subject to explain his side.

11. Based on a thorough examination of the findings, the Whistle and Ethics Officer shall submit a report to the Chairman of the Board of Directors, on a regular basis about all Protected Disclosures referred to him/her since the last report together with the results of investigations, if any.

## **9. Protection to Whistle Blowers**

1. The Whistle Blower(s) under the Policy are entitled to get adequate protection provided that Protected Disclosures is made in good faith and the Whistle Blower has reasonable information or documents in support thereof and no disclosures are made for personal gain or on account of animosity against the Subject(s). Every effort will be made to protect the identity of the Whistle Blower, subject to legal constraints except in cases where the Whistle Blower have been found to be mala fide, frivolous or malicious, shall be liable to be prosecuted under the Company's code of conduct.

2. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower(s). Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties / functions including making further Protected Disclosure. If Whistle Blower named any witnesses in the Protected Disclosure, the protection available to the Whistle Blower under this Policy shall also be made available to the witnesses whether participating in the enquiry/investigation or not. Any other Director/Employee/Other Stakeholders assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower.

3. A Whistle Blower may report any violation of the above clause to the Chairman of the Board of Directors, who shall investigate the same and recommend a suitable action to the management.

## **10. Secrecy / Confidentiality**

The Whistle Blower, the Subject, the Whistle and Ethics Officer and everyone involved in the process shall:

- a. Maintain complete confidentiality / secrecy of the matter.
- b. Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.
- c. Not discuss the matter in any informal/ social gatherings/ meetings.
- d. Not to keep the papers unattended anywhere at any time.
- e. Keep the electronic mails/ files under password.

## **11. Decision**

a. If an investigation leads the Whistle and Ethics Officer / Chairman of the Board of Directors, to conclude that an improper and unethical act has been committed, Whistle and Ethics Officer / Chairman of the Board of Directors, shall recommend to the management of the Company to take such disciplinary or corrective action as he may deem fit.

b. However, any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

c. If the report of investigation is not to the satisfaction of the Whistle Blower, the Whistle Blower has the right to report the event to the appropriate legal or investigating agency.

d. A Whistle Blower who makes false allegations of unethical & improper practices or about alleged wrongful conduct of the Subject to the Whistle and Ethics Officer / Chairman of the Board of Directors, shall be subject to appropriate disciplinary action in accordance with the rules, procedure and policies of JCPL.

## **12. Reporting**

The Whistle and Ethics Officer shall report the details of all Protected Disclosures to the Board of Directors, with the results of investigations and an update on the actions taken by the management at least once a year.

## **13. Access to the Chairman of the Board of Directors**

A Whistle Blower shall have every right of direct access to the Chairman of Board of Directors, in exceptional cases and the Chairman of the Board of Directors, is authorized to prescribe suitable directions in this regard.

## **14. Record keeping**

All Protected disclosures in writing or documented along with the results of Investigation relating to the Protected Disclosures, shall be retained by the Company for a period of 8 (Eight) years or such other period as specified by any other law in force, whichever is more.

## **15. Policy review and updates**

This policy shall be reviewed by the Board of Directors, as and when required or at least annually for incorporating regulatory updates and changes, if any. Modifications, if any, recommended by the Board shall be put up to the Board for approval.

## **16. Amendment**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them in writing. The amendments so made shall not be contrary to any act, rules, regulation, circular or notification issued by the Government on this behalf. The amendments shall also be published on the official website of the Company.