



(Formerly known as Quality Enviro Engineers (P) Limited)

An ISO 9001 : 2015 Certified Company

Mfr. Importer & Supplier of: Waste Handling & Air Pollution Equipments



Regd. office : S-2, Dada Market, Sahibabad
Railway Station Road-II, Sahibabad,
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CIN NO. U29190UP2016PLC082974

VIGIL MECHANISM/WHISTLE BLOWER POLICY

QUALITY ENVIRO ENGINEERS LIMITED

(Formerly Known as Quality Enviro Engineers Private Limited)

Scope and Purpose:

The Company is committed to conducting its business by adopting the highest standards of professional integrity and ethical behavior. The organization has been aiming at developing an open and transparent culture where it is safe for all employees and stakeholders to raise their concern about any unacceptable and unethical practices, including misconduct and provide reassurance that they will be protected from reprisals or victimization for whistle blowing in good faith.

The Company is committed to adopting procedures to receive and address any concern or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, reporting of fraudulent practices, employee misconduct, health, safety and environmental issues which cannot be resolved through normal management channels.

Pursuant to Section 177(9) of the Companies Act, 2013, as amended (the “Companies Act”), Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014, as amended (the “Rules”) and applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (the “Listing Regulations”), including Regulation 4(2)(d)(iv) thereof, every listed company or such class or classes of companies, as may be prescribed, shall establish a vigil mechanism for their directors and employees to report their genuine concerns or grievances.

The vigil mechanism shall provide for adequate safeguards against victimization of directors, employees or any other persons who use such mechanism and make provision for direct access to the Chairperson of the Audit Committee in appropriate or exceptional cases. As per the Rules, the companies which are required to constitute an Audit Committee (‘Committee’) shall oversee the vigil mechanism through the Committee.

Regulation 9A (6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (‘SEBI PIT Regulations’) mandates that every Listed Company should have a whistleblower policy and make employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information.

Policy Statement



Factory : Khasra No. 1090, Industrial Area, Near Kanshiram Awasthi,
Yojna, Faridnagar, Ghaziabad, Uttar Pradesh, 245304



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This vigil mechanism/whistle-blower policy (this “Policy”) aims:

- 1) To allow and encourage all directors, employees, customers, business associates, agents, consultants and other stakeholders to freely communicate concerns about suspected unethical behavior, malpractice, wrongful conduct, fraud, violation of the Company's policies including its Code of Conduct, violation of law, rules and regulations or questionable accounting or auditing matters by any employee/director in the Company (hereinafter referred to as “Whistle Blower”) without fear of reprisal.
- 2) To ensure timely and consistent organizational response and thereby ensuring complete transparency in the organization.
- 3) To prohibit initiation of adverse action against a Whistle Blower as a result of the disclosure of any Wrongful Conduct (as defined below).
- 4) To build and strengthen a culture of transparency and trust in the organization.

Who Can Make Disclosure

Under the Whistle Blower Policy, any Director on the Board, employees of the Company and other stakeholders referred to in the Policy Statement above can make bona-fide communication of any improper activity in relation to the matters concerning the Company, under this Policy.

Disclosure:

The information on suspected wrongful conduct is such information which the Whistle Blower in good faith believes to be an unethical or improper activity under the scope of this Policy (“**Wrongful Conduct**”). Wrongful Conduct should be factual and not speculative or in the nature of an interpretation/ conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern. It includes, without limitation, the following:

1. Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
2. Fraud or deliberate error in recording and maintaining of financial records of the Company;
3. Deficiencies in or non-compliance with the Company's internal accounting controls;
4. Violation of provisions of any law, rules and regulations;
5. Pass back of commissions/benefits and conflict of interest;
6. Procurement frauds, fraud and corrupt practices;
7. Manipulation of the Company's data/records;
8. Stealing cash/the Company's assets;

Dr. Arvind



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9. Leaking confidential or proprietary information;
10. Unofficial use of Company's assets and human resources;
11. A substantial and specific danger to public health and safety; and
12. An abuse of authority and an act of discrimination or sexual harassment.

The above list is only illustrative and should not be considered exhaustive.

Protected Disclosure:

Protected Disclosure means any communication made in good faith by a Whistle Blower disclosing information relating to unethical behaviour or conduct, actual or suspected fraud, financial irregularities, violation of applicable laws and the Company's internal policies and bye-laws, breach of regulatory requirements or any improper practices affecting the Company.

Reporting Mechanism

Any Whistle Blower who becomes aware of a suspected Wrongful Conduct is encouraged to send his/her observations/concrete facts with related evidence without fear of reprisal or retaliation of any kind. This Policy is not intended to cover career related or other personal grievances. The Whistle Blower's role is limited to reporting only and is not investigators or finders of facts, nor can they determine the appropriate corrective or remedial action that may be warranted.

A Whistle Blower can through written communication, complete with related evidence, send the Protected Disclosure of actual facts to the Audit Committee, addressed to the Chairperson of the Audit Committee. The Whistle Blower should provide such information and evidence as is reasonably available to him/her; the absence of conclusive evidence shall not by itself render a disclosure as not made in good faith. The Protected Disclosure should be made as soon as possible, preferably within 30 days after the Whistle Blower becomes aware of the same so as to ensure a clear understanding of the issues raised and should either be typed or written in legible handwriting in English or Hindi.

Instances of leak or suspected leak of Unpublished Price Sensitive Information may also be reported under this Policy in terms of Regulation 9A(6) of the SEBI PIT Regulations, and shall be dealt with in accordance with the Policy and Procedures for Inquiry in case of Leak of Unpublished Price Sensitive Information of the Company.

The Protected Disclosure should be submitted in a closed and secured envelope and should be superscribed as "Protected Disclosure under the Whistle Blower Policy". Alternatively, the same can also be sent through email with the subject "Protected Disclosure under the Whistle Blower Policy". If the complaint is not super-scribed and closed as mentioned above, it may not be possible to protect the Complainant and the Protected Disclosure will be dealt with as if a normal disclosure.

Prakash

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In order to protect the identity of the Whistle Blower, no acknowledgment will be given to the Complainant and he/she is advised not to write their name/address on the envelope. Anonymous / Pseudonymous disclosure shall not be entertained and will ordinarily NOT be investigated however it shall be the duty and responsibility of the Audit Committee, to protect the identity of the Whistle Blower. The Protected Disclosure should be forwarded under a covering letter signed by the Whistle Blower.

Investigation

On receipt of disclosure of any Wrongful Conduct, the Chairperson of the Audit Committee shall make a record of such disclosure and place it before the Audit Committee. He/ She shall also carry out initial investigation either himself/herself or by involving any other officer of the Company or any outside agency to ascertain its genuineness and veracity. If he/she finds the complaint to be genuine, he/she shall make further investigation into the matter. A person against or in relation to whom a disclosure is made or evidence gathered during the course of investigation will have a duty to cooperate with the investigation and would be given an opportunity of being heard. The identity of the Subject shall be kept confidential to the extent possible. The investigation will be completed within 30 days of receipt of disclosure, or such extended time which may be permitted by the Committee.

If any investigation leads the Chairperson of the Committee to conclude that a Wrongful Conduct has been committed, he/she shall submit his/her report to the Audit Committee. The Committee may call for further information or particulars from the concerned person and accordingly it shall take such disciplinary or corrective action as may deem fit. Subject(s) have a right to consult with a person or persons of their choice, other than the investigators and/or members of the Audit Committee and/or the Whistle Blower. Subject(s) have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed, or tampered with and witnesses shall not be influenced, coached, threatened, or intimidated by the subject(s).

The Chairperson of the Audit Committee, members of the Audit Committee and everybody involved in the process shall maintain confidentiality of all matters (including the identity of the Whistle Blower) under this Policy.

Decision And Action

Upon completion of the investigation, the findings shall be placed before the Chairperson of the Audit Committee or the Audit Committee, as the case may be.

If the investigation concludes that an improper, unlawful or unethical act has been committed, the Chairperson of the Audit Committee shall recommend appropriate disciplinary, corrective or remedial action to the management of the Company.

Such action may include, but is not limited to, depending on the nature and seriousness of the misconduct:

Prince Singh



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- Issuance of warning or reprimand;
- Suspension, demotion or termination of employment;
- Recovery of financial loss suffered by the Company;
- Modification of internal controls or processes;
- Reporting of the matter to regulatory or law enforcement authorities, where required; and
- Any other action considered appropriate in the interest of the Company.

The decision of the Audit Committee shall be final and binding, subject to applicable laws.

Protection to the Whistle Blower Confidentiality

All information disclosed during the course of the investigation will remain confidential, except as necessary or appropriate to conduct the investigation or required by applicable law.

Protection against Victimization

The Company strictly prohibits discrimination, retaliation or harassment of any kind against any Whistle Blower. Anyone who retaliates against a Whistle Blower, who has raised any issue in good faith, will be subject to strict disciplinary action. If the Whistle Blower believes that he/she is being subjected to discrimination, retaliation or harassment, he/she should immediately report the matter to the Chairperson of the Audit Committee. The Company would take steps to minimize difficulties which the Whistle Blower may experience as a result of the disclosure.

False Complaints

While this Policy affords all protection to the Whistle Blower, misuse of this Policy by making frivolous and bogus complaint with mala fide intentions is strictly prohibited. Any person who makes complaints with mala fide intentions will be subject to strict disciplinary action.

Retention of the Records

The Company shall retain a copy of all complaints or concerns, investigation reports and all relevant documentation thereof. Such records shall be retained for a minimum period of eight years, or such longer period as may be decided by the Audit Committee or required under applicable law, in accordance with the Policy on Preservation of Documents of the Company.

Reporting and Review



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A report with number of complaints received under this Policy and their outcome shall be placed by the Chairperson before the Audit Committee on a regular basis. All significant complaints and investigation findings shall be placed before the Audit Committee. In case any member of the Audit Committee has a conflict of interest in a matter, such member shall recuse himself/herself from deliberations, and the remaining members shall handle the matter independently. The Audit Committee shall review the functioning of the whistle-blower mechanism created pursuant to this Policy from time to time.

Disclosure

This Policy shall be disclosed in the annual report of the Company and posted on the website of the Company, if required under the Companies Act, 2013 and rules thereunder, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, and any other regulatory requirements.

Amendment

The Company reserves the right to amend this Policy at any point of time. Any amendment to this Policy shall take effect from the date when it is approved by the Board.

Complaint can be sent via email: auditcommittee@qualityenviroengineer.com



Ashwani Srivastava
(Chairman & Managing Director)
DIN: 07384826
Add: 975, Sector-3, Vasundhara
Ghaziabad, Uttar Pradesh, 201012

Date: September 26, 2026
Place: Ghaziabad

