

Deccan Bearings Limited

POLICY FOR PROCEDURE OF ENQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION ("UPSI")

[Under Regulation 9A, Sub-regulation (5) of SEBI (Prohibition of insider Trading) Regulations, 2015)

1. All capitalized terms used in this Code but not defined herein shall have the meanings assigned to them under the SEBI (Substantial Acquisition and Takeover) Regulations, 2011 ("the Regulations"), the Companies Act, 1956 or Companies Act, 2013, as the case may be.
2. An employee or an Insider or a Designated Person of the Company, upon becoming aware of an actual or suspected leak of Unpublished Price Sensitive ("UPSI") of the Company, shall promptly inform of the same to the Compliance Officer.
3. In case of an actual leak, the Compliance Officer shall promptly inform the stock exchanges about the UPSI in the manner required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
4. The Compliance Officer, along with the Chief Internal Auditor will conduct an enquiry immediately upon becoming aware, either on their own or by way of information from any person including an unknown person and by way of a report under the Whistleblower Policy of the Company, of an actual or suspected leak of an UPSI, will promptly conduct and submit a report to the Directors of the Company and SEBI about the leak, the enquiries and the result in such format as may be deemed fit. The Compliance Officer and the Chief Internal Auditor may take support of any employee or third person under strict obligations of confidentiality to conduct such enquiry. Under the Regulations, it is the responsibility of any Fiduciary or Intermediary to cooperate in such enquiry process.
5. The Board of Directors will take such actions including penal actions against the offender(s) as may be deemed appropriate and required by law upon receipt of the enquiry report. Such penal action may include wage freeze, suspension, recovery, termination of employment contract agreement etc.

Approved by the Board of Directors on 29th March, 2019. Subsequent modification(s) / amendment (s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Policy.



Whistle-blower Policy

Purpose of this Policy

Deccan Bearings Limited is committed to complying with the laws that apply to them, the Code of Conduct of the Company and particularly to assuring that business is conducted with integrity and that the Company's financial information is accurate. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, both the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties. Consequentially, and to promote ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Employees and Directors may raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (the "Policy" or the "Whistleblower Policy").

In case of any suspected violation of any law that applies to the Company and any suspected violation of the Company's Code of Conduct, an Employee or Director may report the same in the manner mentioned in this Policy. Such violations include, but are not limited to, accounting or financial reporting violations, fraud, misappropriation of money, discrimination or harassment based on gender, race, religion, language, etc., unlawful manipulations, insider trading, bribery, or violations of the anti-retaliation aspects of this Policy. Retaliation includes adverse actions, harassment, or discrimination in employment relating to a report of a suspected violation.

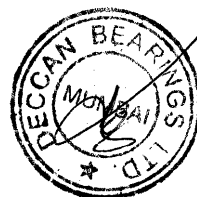
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How to Report

A report of suspected violation may be made either with name or anonymously to:
deccan.bearings9@gmail.com

or by sending a letter with name or an anonymously letter to the Company Secretary at :
Deccan Bearings limited

315 / 321, Prospect Chambers, 2nd floor, Dr D N Road, Fort, Mumbai, Maharashtra, 400001



with a copy of such an e-mail or letter to deccan.bearings9@gmail.com

If you have reason to believe that the Managing Director, the Director, Finance or the Company Secretary is involved in the suspected violation, your report may be made in sealed envelope to the Audit Committee of Board of Directors (the "Audit Committee") at:

Chairman, Audit Committee
Deccan Bearings Ltd.
315 / 321 Prospect Chambers
2nd floor Dr D N Road Fort
Mumbai, Maharashtra, 400001

with copy to deccan.bearings9@gmail.com

If you have any complaint against the Chairman of the Audit Committee or the member of the Audit Committee, your report may be made in sealed envelope to Chairman, Deccan Bearings Limited Such complaints may also be made by e-mail to deccan.bearings9@gmail.com

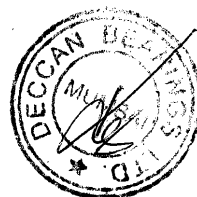
The report should include maximum possible information about the suspected violation. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. The named reporting person may be contacted for further information.

Investigations after Report

All reports under this Policy will be promptly and appropriately investigated by a Committee of Whole time Director, Director, Finance & Company Secretary or Chairman of the Audit Committee or the Chairman, as the case may be, with assistance of such other person, as they deem fit and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. An investigation will be a neutral fact finding process with evidence. Everyone working for or with the Company has a duty to cooperate in the investigation of reports of violations.

Failure to cooperate in an investigation, or deliberately providing false information during an investigation, will be the basis for disciplinary action. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense.

This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy. Result of an investigation will be communicated to the complainant and may be disclosed to employees/public. Summary of all reports and actions taken will be tabled at Audit Committee meetings. Retaliation is not tolerated.



No one may take any adverse action against any employee for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation with basis

Under this Policy Incidents of retaliation against any employee reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible.

Confidentiality

Employees and Directors will maintain confidentiality obligations. Reporting in accordance with this Policy does not tantamount to breach of confidentiality obligations.

Malicious and unfounded allegations

Employees and Directors are not to make malicious or unfounded allegations but may make allegations in good faith where there is reasonable ground of suspicion and basis.

No protection from adverse action

This policy does not protect an employee from an adverse or a disciplinary action taken independent of any disclosure made pursuant to this policy.

Action in terms of other laws

This Policy does not prevent a person or the Company from taking an action under any applicable law

Document Retention

All documents related to reporting, investigation and enforcement pursuant to this Policy may be retained by the Company

Awareness

All reasonable and appropriate steps will be taken to make employees of the Company aware of this Policy to enable employees to report instances of leakage of unpublished price sensitive information (UPSI).

As approved by the Board of Directors on 29th March, 2019. Subsequent modification(s) / amendment (s) to the Companies Act, 2013 and SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.

