

Objective

It serves as an avenue for all members employed directly or on vendor payroll at the company to raise their concerns about any corrupt, unethical, unprofessional or unacceptable practice and/ or any other event directly or indirectly against the company rules, ethos, and business, code of conduct or practices. The whistle blower policy is intended to provide necessary safeguards for protection of employees from harassment, reprisals and victimization.

Applicability and Eligibility

The policy is applicable to all employees in direct or indirect employment at the company. The application of this policy is valid until an employee wishes to report to the management instances of unethical behavior, actual or suspected fraud or violation of the Company's code of conduct. In no ways, does the applicability of this policy misinterpret the employee's obligation towards maintaining confidentiality at all times or permit the employee to use it as a route for taking up a grievance or be a route for raising malicious or unfounded allegations against a colleague/s.

Responsibility

The responsibility of this policy is vested in the hands of the CEO & the HR Head.

Definitions

- **Complainant or "Whistleblower":** A member making a protected disclosure with valid grounds of concern under this policy is commonly referred to as a complainant (whistleblower).
- **Ombudsperson:** The CEO is the Ombudsperson for the company. He is authorized by the board of company for the purpose of receiving all complaints under this policy and ensuring appropriate action.

Guidelines

- Protection for Whistle Blower
- The identity of the whistle blower, subject and any other Member assisting the inquiry/ investigation, shall be kept confidential at all times, except during the course of any legal proceedings, where a Disclosure/statement is required to be filed.
- The Company, as a policy, strongly condemns and discourages any kind of discrimination, harassment or any other unfair employment practice being adopted against the whistle blowers for disclosures made under this policy. No unfair treatment shall be meted out towards the whistle blower by virtue of his/her having reported a disclosure under this policy and the company shall ensure that full protection has been granted to him/her against:
 - a. Unfair employment practices like retaliation, victimization, threat or intimidation of termination/suspension of services, etc;

- b. Disciplinary action including transfer, demotion, refusal of promotion, etc;
- c. Direct or indirect abuse of authority to obstruct the whistle blowers right to continue performance of his duties/functions during routine daily operations, including making further disclosures under this policy.
- The whistle blower may also report any violation of the above clause to the CEO (ombudsperson) who may direct an investigation into the same and recommend suitable action to the Board.

Coverage

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

- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records
- Financial irregularities, including fraud, or suspected fraud
- Criminal offence, deliberate violation of law
- Perforation of confidential/propriety information
- Wastage/misappropriation of company funds/assets
- Breach of employee Code of Conduct/Ethics Policy or Rules
- Any other unethical, biased, favored, imprudent event which compromises the interests of the company, its employees and society per se.

Disqualifications

- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention will warrant disciplinary action.
- Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious shall be liable to be prosecuted under Company's Code of Conduct.

Procedure

- All members are encouraged to report to the management promptly, any breach or suspected breach of any law, regulation, the company's Code of Conduct or other company policies and guidelines, and any concerns regarding irregularities of a general, operational or financial nature in the Company.
- If any member has any concern regarding an irregularity in which his/her immediate manager or other senior management members are involved, he or she should notify the CEO (Ombudsperson) directly.
- Member who reports an irregularity shall avoid any form of external or internal publicity about the irregularity they want to report.
- The CEO (ombudsperson) shall acknowledge the receipt of concern to the complainant and shall document the initial enquiry. All complaints received will be recorded and looked into by the CEO. If initial enquiries indicate that the concern has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at the initial stage after investigation, and the decision is documented.
- Where the initial enquiries indicate that further investigation is necessary, they will be carried through either by the CEO (ombudsperson alone), or with the Head HR.
- The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt. A written report of the finding would be made by the ombudsperson.
- Based on a thorough examination of the findings, the CEO and /or Head HR would recommend an appropriate course of action to the Board.
- Where an improper practice is proved, this would cover suggested disciplinary action, including dismissal, if applicable as well as preventive measures for the future.
- Where a criminal offense/ violation of law is discovered, such cases would be referred to competent authorities for further action.