

Whistle Blower Policy

Objective:

To provide a mechanism to employees to report any unethical, improper practices or any wrongful conduct they observe in the company.

Applicability:

All employees of the Company. The Protected Disclosure will be in relation to matters concerning the Company.

Definitions:

1. “Protected Disclosure” means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
2. “Whistle Blower” means an employee making a protected disclosure under this policy.

Policy & Procedures:

- Any employee may report on any unethical or wrongful practices, or conduct they have observed in the company.
- The whistle blower’s role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.
- 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 of this protection will warrant disciplinary action.
- Whistle blowers, who make any protected disclosures, which have been subsequently found to be malafide or malicious or whistle blowers who make 3 or more protected disclosures, which have been subsequently found to be frivolous, baseless or reported otherwise than in good faith, will be disqualified from reporting further protected disclosures under this policy.
- All protected disclosures in respect of all matters should be addressed to the Group Managing Director (MD), directly.
- Appropriate care will be taken to keep the identity of the Whistle Blower confidential.
- Protected Disclosure should preferably be reported, in writing, so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower.
- The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the whistle blower.
- Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.
- We expect those bringing up such issues to have the conviction to be bold enough to state their identity. We do not encourage or entertain anonymous information.

Investigation Procedure:

- All protected disclosures reported under this policy will be thoroughly investigated under the authorization of the Group MD.