



Whistle Blower Policy

Objective

- We are committed to the highest standards of moral and ethical integrity, transparency and propriety in all its business dealings. The company has adopted the Code of Business Conduct which lays down the principals that should govern the actions of the Company and its employees.
- Any actual or potential violation of the Code, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company.
- Accordingly, this “Whistle Blower Policy” has been formulated with a view to provide a mechanism for employees or even people who are not connected with the Company to raise concerns on any violations of the Code of Business Conduct.
- Thus, every employee of the Company, shall promptly report to the “Whistle Officer” any actual or possible violation of the Code or an event he/she becomes aware of that could affect the business or reputation of the Company without fear of punishment or unfair treatment.

Definitions

- “Disciplinary Action” means any action that can be taken on the completion of/during the investigation proceedings including but not limited to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
- “Employee” for purpose of this policy means every employee of the Company including contract workers, trainee’s, apprentices, ex-employees & Directors of the Company.
- “Stakeholders” means contractor’s, vendors, suppliers or agencies/consultants (or any of their employees), customers or any other person having an association with the Company.
- “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.
- “Subject” means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during course of an investigation under this policy.
- “Whistle Blower” is someone who makes a Protected Disclosure under this policy.
- “Whistle Officer” means an officer who is nominated to conduct a detailed investigation of the disclosure received from the Whistle Blower and recommends disciplinary action.