



Whistleblower Policy

1. Purpose

The purpose of this policy is to provide employees, contractors, vendors, and stakeholders with a safe, secure, and confidential mechanism to report unethical practices, misconduct, fraud, or violations of company policies and laws without fear of retaliation.

2. Scope

This policy applies to:

- All employees (permanent, contractual, trainees, apprentices).
- Directors, vendors, contractors, consultants, and other business partners.
- Any individual associated with the organization who wishes to report concerns.

3. Policy Statement

The organization is committed to the highest standards of integrity, ethics, and accountability. Any malpractice, misconduct, or unethical behavior must be reported and addressed promptly.

4. Reportable Concerns

Concerns that may be reported under this policy include (but are not limited to):

- Fraud, theft, bribery, or corruption.
- Accounting or financial irregularities.
- Violation of laws, regulations, or company policies.
- Health, safety, and environmental violations.
- Harassment, discrimination, or abuse of authority.
- Any other unethical or illegal conduct.

5. Reporting Mechanism

- Reports may be made through:
 - **Whistleblower Hotline** (dedicated phone line).
 - **Email:** [confidential email ID].
 - **Drop Box:** Secure physical drop box at workplace.
 - **Direct Reporting:** To the Whistleblower Committee / Ombudsperson / HR Head.

- Reports may be made **anonymously**, though providing identity may help in investigation.

6. Protection of Whistleblowers

- Whistleblowers will be protected from retaliation, victimization, or discrimination.
- Retaliatory actions against whistleblowers will result in strict disciplinary measures.
- Confidentiality of the whistleblower's identity will be maintained to the extent possible.

7. Investigation Process

1. Complaint received and acknowledged by the Whistleblower Committee.
2. Preliminary review to determine if investigation is required.
3. Appointment of an independent investigation team.
4. Collection of evidence, interviews, and fact-finding.
5. Submission of report to Management / Board Audit Committee.
6. Corrective action taken, including disciplinary measures if required.

8. Roles & Responsibilities

- **Whistleblower Committee / Compliance Officer:** Receive, document, and investigate reports.
- **Management:** Ensure fair resolution and corrective action.
- **Employees:** Report concerns in good faith and cooperate with investigations.

9. False Complaints

- If a complaint is found to be **malicious or false with intent**, disciplinary action may be taken against the complainant.

10. References

This policy is in line with:

- **Companies Act, 2013** (Section 177 – Vigil Mechanism).
- **SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015** (for listed companies).
- International best practices in corporate governance and ethics.



11. Review of Policy

This policy will be reviewed every **2 years** or earlier if required by law.

Authorized Signatory

A handwritten signature in blue ink, appearing to be 'M. S. S.', is written over a vertical line.

(CEO / MD / Board of Directors)

Date: 01.04.2024

