

**Annexure-I**  
**WHISTLER BLOWER POLICY**

**1. Objective:**

The objective of this policy is to build and strengthen a culture of transparency and trust in the organization and to provide employees with a framework / procedure for responsible and secure reporting of improper activities (whistle blowing) and to protect employees wishing to raise a concern about improper activity / serious irregularities within the Company.

**2. Definitions:**

- **“Audit Committee”** means the Audit Committee of Directors constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013.
- **“Protected Disclosure”** means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- **“Whistle Blower”** means an employee making a Protected Disclosure under this policy.
- **“Vigilance Officer”** is a person nominated/appointed to receive Protected Disclosures from Whistle Blower, maintaining records thereof, placing the same before the Audit Committee/Board of Directors of the Company for its disposal and informing the Whistle Blower the result thereof.

**3. Procedures - Essentials and Handling of Protected Disclosure:**

- The Protected Disclosure / Complaint should be attached to a letter bearing the identity of the whistle blower / complainant i.e. his/her Name, Employee Number and Location, and should be in a closed / secured / sealed envelope addressed to the to the Vigilance Officer of the Company or to the Chairman of the Audit Committee in exceptional cases, which should be super-scribed “Protected Disclosure”. (If the envelope is not super-scribed and closed / sealed / secured, it will not be possible to provide protection to the whistle blower as specified under this policy).
- Anonymous or pseudonymous protected disclosure shall not be entertained.
- Protected Disclosure should either be typed or written in legible hand writing in English, Hindi or Regional language of the place of employment of the whistle blower and should provide a clear understanding of the Improper Activity involved or issue / concern raised. The reporting should be factual and not speculative in nature. It must contain as much relevant information as possible and should help in initial assessment and investigation.
- The contact details of the Vigilance Officer are as under:-

Name:	Ms. Pranali Chavan
Address:	3 <sup>rd</sup> Floor, West Wing, Forbes Building, Charanjit Rai Marg, Fort, Mumbai – 400001.
Email id:	<a href="mailto:pranali.chavan@hse.in">pranali.chavan@hse.in</a>