

# WHISTLE BLOWER POLICY

## 1. PURPOSE

To provide an internal mechanism to the Company to be notified of concerns about malpractices at the workplace.

## 2. SCOPE

This policy applies to all people who work for the Company. References in this policy to "Employee" shall include Regular Employees, Consultants, Retainers, Contractors, Agency Staff etc.

## 3. INTRODUCTION

As a conscious and vigilant organization, K Raheja Corp believes in the conducting business in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior. It expects all Employees to maintain the same standards in everything they do. Employees are therefore encouraged to report any wrongdoing within company that falls short of these business principles.

In its endeavour to provide its employee a secure and a fearless working environment, K Raheja Corp has established the "Whistle Blower Policy".

This policy has been created with the objective of providing Employees to raise concerns which seem to go against the company's commitment to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.

Employees are encouraged to use the procedure set out below if they have any concerns at all about any wrongdoing at work.

## 4. POLICY COVERAGE

"Whistle-blowing" means a disclosure of information relating to any of the following (irrespective of whether the matter complained of is happening now, took place in the past or is likely to happen in the future):

1. Abuse of authority
2. Manipulation of Company Data / records
3. Financial irregularities, including fraud or suspected fraud.
4. Pilferage of confidential Company information
5. Wastage / misappropriation of Company funds / assets
6. Deliberate violation of law / regulation
7. Negligence causing danger to individual / public health and safety
8. Breach of contract
9. Criminal offence
10. Damage to the environment

## 5. DISQUALIFICATION

At no point employees should use this platform as a route for taking up personal grievances against someone.

Whistle Blowers, who make disclosures, which when subsequently are found to be *mala fide*, *frivolous*, *malicious* or *baseless* shall be liable for appropriate disciplinary action.

## 6. PROCEDURE FOR RAISING THE CONCERN

1. Conduct falling within the area of a disclosure is taken very seriously by the Company. Our expectation is that there will never be an occasion when any of our Employees would experience such an incident.

However, if anyone is aware of any conduct falling within that identified in the Qualifying Disclosure we would urge them to come forward as soon as possible. However minor, it is best that problems are brought to the attention of the Company as early as possible so that they can be addressed before becoming too serious.

2. Whistle Blowers can raise their concerns in writing to any of the following designated authorities:

- a. Mr. Shabbir Kanchwala - Vice President – Purchase & Project Co-ordination
- b. Ms. Urvi Aradhya - Vice President – HR & Admin
- c. Ms. Dolly Khatwani - General Manager - Legal

3. Whistle Blower must put his / her name on the disclosure. Concerns expressed anonymously **WILL NOT BE** usually investigated BUT subject to the seriousness of the issue raised, the designated authority can initiate an investigation independently
4. Employees can be assured that if they do come forward with any concern, everything possible will be done to respect their confidentiality. If we discover that any other Employee had tried to discourage another Employee from coming forward or had victimized that Employee, this would be treated as a serious disciplinary offence.

## 7. INVESTIGATION

1. The investigation will be carried out in a fair manner, as a neutral fact finding process and without presumption of guilt.
2. If there is a case to answer, and if appropriate, disciplinary action will be taken against the person/s who are the subject to the allegation/s.
3. You will be given feedback with regard to outcome of the investigation within 7 working days of completion of the investigation. The exact nature of any disciplinary action taken against any person will remain confidential.

4. Whether there was a case to answer or not, and provided that your disclosure was made in good faith because you reasonably believed it to be true, the company will ensure that you are protected from reprisal or victimization as a result of your complaint.
5. Only where it is established that your allegations were false and made maliciously will disciplinary action be taken against you. Such disclosures will be treated as gross misconduct and the employee is liable for appropriate disciplinary action.

## **8. AMENDMENT**

The Company reserves the right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.