

Whistleblower Policy

1. Introduction

The Whistle Blower policy is intended to provide a mechanism for the reporting of illegal activity or the misuse of Company's assets while protecting the employees who make such reports from retaliation.

The Company requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is the duty of the employees and representatives of the organization, to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations.

2. Scope and Applicability

This Policy covers malpractices and events which have taken place/suspected to have taken place, including but not limited to misuse or abuse of authority, fraud or suspected fraud, violation of Company rules, manipulations, negligence causing danger to public health and safety, misappropriation of the Company's funds/assets or resources, pilferation of confidentiality, deliberate violation of law/regulation, other matters or activity on account of which the interest of the Company is affected and formally reported by whistle blowers concerning its employees. The policy shall come into force from immediate effect and shall be applicable to all the employees of the Company.

3. Whistleblower Defined

An employee, director or officer who informs a supervisor or the Company's management about an activity relating to the Company which that person believes to be fraudulent or dishonest.

4. Reporting Requirement

In the event an employee suspects illegal conduct or conduct involving misuse of Company's assets or violation of the law, he or she may report it, anonymously if the employee wishes in the form of a report to any of the following Company's executives at any time: chief executive, chief financial officer, or the head of human resources. Company will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with the obligation to conduct a full and fair investigation.

It is the responsibility of all directors, officers, and employees to report violations or suspected violations in accordance with this Whistle Blower Policy.

5. No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. This

Whistle Blower Policy is intended to encourage and enable employees and others to raise serious concerns within the Company prior to seeking resolution outside the Company.

6. Whistleblower Protection

- Company will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law.
- Employees of the Company may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest
- Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations.

7. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

8. Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and Company will take appropriate action in such an event.