

WAPCOS LIMITED

(A Government of India Undertaking)

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WHISTLE BLOWER POLICY

1. Preface

- (a) The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour.
- (b) The Company is committed to developing a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct.
- (c) The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects employees wishing to raise a concern about serious irregularities within the Company.
- (d) The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

2. Applicability

This policy applies to all regular/contract employees as well as to deputationists in the Company.

3. Scope of Policy

The policy intends to cover serious complaints that could have a large impact on WAPCOS such as :

- (a) Manipulation of Company's data/records
- (b) Financial irregularities, including fraud, or suspected fraud
- (c) An abuse of authority
- (d) Leaking or confidential or proprietary information
- (e) Violation of any law or regulations
- (f) Wastage or misappropriation of Company's funds/assets
- (g) Violation of Company's policies including Code of Conduct
- (h) Any other unethical, biased, favoured, imprudent event

The above list is only illustrative and should not be considered as exhaustive.

4. Procedures

- (a) Any employee of the Company may submit, on a confidential basis if the employee so desires, any concerns regarding manipulation of Company data / records, financial irregularities, including fraud, or suspected fraud, an abuse of authority, leaking confidential or proprietary information, violation of any law or regulations, gross wastage or misappropriation of Company's funds/assets, violation of Company's policies including Code of Conduct, any other unethical, biased, favoured, imprudent event etc. All such concerns are to be set forth in writing and forwarded in a sealed envelope to CMD WAPCOS.

- (b) The CMD WAPCOS on receipt of a complaint or concern shall constitute a committee known as the Whistle Blower Committee.
- (c) The Whistle Blower Committee shall appropriately and expeditiously investigate all whistle blower reports received.
- (d) The Whistle Blower Committee shall have right to call for any information / document and examination of any employee of the Company or other person(s) as it may deem appropriate for the purpose of conducting investigation under this policy.
- (e) After completion of investigation, a report shall be prepared by Whistle Blower Committee and be placed before CMD WAPCOS.
- (f) After considering the report, CMD WAPCOS shall determine the cause of action and may order for remedies which may inter alia include:
 - (i) Revision of the policies and procedures of the Company to reduce the risk of reoccurrence
 - (ii) Suggest action against concerned persons

5. Protection

No discrimination, harassment, victimization or any other unfair employment practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, demotion, refusal of promotion, or the like will be adopted against Whistle Blowers.

6. Anonymous Allegations

This policy requires individuals to put their name to any disclosures they make.

7. Confidentiality

The Company will treat all such disclosures in a sensitive manner and will endeavour to keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.

8. Untrue / Malicious / Vexatious Allegations

If an individual makes an allegation, which is not confirmed by subsequent investigation and the investigation shows that an individual has made malicious or vexatious allegations for personal leverage, and particularly if he or she persists with making them, disciplinary action may be taken against the individual concerned.

9. Notification

All departmental heads are required to notify and communicate the existence and contents of this policy to the employees of their department. The new employees shall be informed about the policy by the P&A Wing.

All records of any such complaints in the related documents shall be retained by the Company for a period of at least 3 years.