

Synthite

Department of Human Resource

Subject : Whistleblowing		Policy No :60	
Prepared by : Sr. Manager	Approved by : CHRO	Effective Date: 01/03/2013 01/06/2017 01/03/2024	Version 3

1. Objective:

To establish Whistleblowing mechanism in the organization, as an enabler for reporting of any issues concerning unethical behavior, actual or suspected fraud, violation of the company's code of conduct policy, violation of any applicable laws, substantial mismanagement of company resources and likewise.

2. Scope:

This policy is applicable to all permanent employees of Synthite Industries Limited and its group companies, including employees who are working in overseas offices. Temporary employees and interns are also covered under this policy.

This policy excludes casual and migrant labourers.

3. Definitions:

3.1 Whistleblower means any employee or customer/vendor who makes a protected disclosure under this policy.

3.2 Protected disclosure: means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

3.3 Permanent employees: means all employees who are on the payroll of Synthite Industries Limited and its group companies.

3.4 Ethics committee: means the committee consisting of the Managing Director, a nominated Director and Head of Corporate Internal Audit

4. Procedure:

The company will publish and display a notification on Whistleblowing at prominent places across the organization.

Employees and customers/vendors can make use of this mechanism for reporting of any unethical or suspected fraud.

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Such protected disclosures should preferably be in writing as per the Whistleblowing notification, and shall be in regional language, English or Hindi.

Protected disclosures should be in factual and not speculative in nature. It should contain as much detail as possible to enable the investigators to arrive at a conclusion.

The whistleblower may disclose his/her identity. Anonymous disclosures will also be entertained.

The Board of Directors assures complete protection (in compliance with applicable laws) to genuine whistleblowers. However, any abuse of this policy would not mean protection from disciplinary actions, arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus.

All protected disclosures will be first reported to and attended by the Managing Director directly.

Depending on the seriousness of the disclosure, this will be referred to the Ethics Committee for further evaluation.

If the issues reported does not warrant any further investigations (as per the decision of the ethics committee) then the same would be closed and noted with reasons documented for the same.

If the ethics committee decides to go ahead with the investigations, then it might be done by the investigators within the company (Corporate Internal Audit) or in some cases will be reported to outside authorities as deem fit.

The identity of the whistleblowers will be kept confidential..

The results of the investigations will not be made known to the whistleblower but will be documented and archived for a minimum period of eight years by Corporate Internal Audit.

Necessary disciplinary actions, if required after investigations will be taken by the company

=End of Policy=

