

## **WHISTLE BLOWING POLICY**

### **PURPOSE**

- a. To create enduring value for all stakeholders and ensure the highest level of honesty, integrity and ethical behaviour in all its operations, the Company has formulated this Whistle Blower Policy in addition to the existing Code of Conduct that governs the actions of its employees.
- b. To encourage all employees and business associates to report unethical business practices at workplace without fear of reprisal.

### **OBJECTIVE**

- a. To allow and encourage our employees and business associates to bring to the management's notice concerns about suspected unethical behavior, malpractice, wrongful conduct, Fraud, violation of the Company's Policies including Code of Ethics and Conduct, violation of law or questionable Accounting or Auditing matters by any employee/director in the company (hereinafter referred to as Wrongful Conduct) without fear of reprisal.
- b. To ensure timely and consistent organizational response and thereby ensuring complete transparency in the organization.
- c. To prohibits initiation of adverse action against an employee or business associate or failing to take an otherwise appropriate action, as a result of the employee's good faith disclosure of alleged wrongful conduct to the Committee.

### **SCOPE**

All employees and business associates of SCHOTT Poonawalla Private Limited.

### **DEFINITIONS**

A whistle-blower as defined by this policy is an employee or business associate of SCHOTT Poonawalla Private Limited who reports an activity that he / she considers

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Approved By

Signature




Date 1<sup>st</sup> of October, 2023  
 Name Rakesh Patel  
 Designation Sr. VP – HR, Admin, Legal & EHS  
 (BU – T&P – Region INDIA)

1<sup>st</sup> of October, 2023  
 Ashok Saxena  
 Managing Director

to be illegal or dishonest. The whistle-blower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate Management officials are charged with these responsibilities.

**RESPONSIBILITY**

Whistle Blower Committee

An employee or business associate who intentionally files a false report of wrongdoing will be subject to disciplinary action.

**POLICY GUIDELINES:**

**a. Making a Disclosure**

- i. Any employee / business associate who becomes aware of a suspected wrongful conduct is encouraged to send his / her observations / concrete fact to the Whistle Blower Committee either through phone or written communication complete with related evidence (to the extent possible) without fear of reprisal or retaliation of any kind.
- ii. The information on suspected wrongful conduct is such Information which the employee/business associate in good faith, believe, evidences:

A violation of any law or regulation, including but not limited to corruption, bribery, theft, fraud, coercion and willful omission:

- Pass back of Commissions/benefits or conflict of interest.
- Procurement frauds.
- Mismanagement, Gross wastage or misappropriation of company funds/assets.
- Manipulation of Company data/records.
- Stealing cash / company assets, leaking confidential or proprietary information.
- Unofficial use of Company's material / human assets.
- Activities violating Company policies including Code of Ethics and Conduct.
- A substantial and specific danger to public health and safety.

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- An abuse of authority.
- Criminal Offence

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

- iii. In alleged wrongful Conduct involving Senior Management, the employee / business associate can directly approach to any of the following as mentioned in Table 'T':

**Table 'T'**

Location	Name & Designation	Contact Details
<b><u>Registered Office at Mumbai:</u></b> 13, 1st Floor, Plot No. 228, Mittal Chambers, Barrister Rajani Patel Marg, Nariman Point, Mumbai MH 400021	Mr. Ashok Saxena, Managing Director	Email: ashok.saxena@schott-Poonawalla.com
	Mr. Rohit Sarmalkar Whole Time Director	Email: rohit.sarmalkar@schott-Poonawalla.com
	Mr. Rakesh Patel Sr. VP – HR, Admin, Legal and EHS (BU T&P Region)	Email: rakesh.patel@schott-Poonawalla.com
<b><u>Factory at Jambusar</u></b> Plot No.1369, Village – Anakhi, Taluka Jambusar, District Bharuch, Gujarat: 392 150	Mr. Rohit Sarmalkar Whole Time Director	Email: rohit.sarmalkar@schott-Poonawalla.com
	Mr. Ajit Kumar Director - Operations	Email: ajit.kumar@schott-Poonawalla.com
	Mr. Dharmendra Patel AGM – HR, Admin and Legal	Email: dharmendra.patel@schott-Poonawalla.com
<b><u>Factory at Umarsadi</u></b>	Mr. Rohit Sarmalkar Whole Time Director	Email: rohit.sarmalkar@schott-Poonawalla.com

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 Name Ashok Saxena  
 Designation Managing Director

S No. 606/P,1,2,3, 608/P-1, 608/2, 609/5,6, 610/1,9, Village Umarsadi (Sim), Taluka Pardi, Valsad, Gujarat - 396 125		com
	Mr. Ajit Kumar Director - Operations	Email:ajit.kumar@schott-Poonawalla.com
	Mr. Krunal Lad AGM – HR, Admin and Legal	Email:krunal.lad@schott-Poonawalla.com
<b>Factory at Baddi</b>  Khasra Number 199, KK320/242, 326/249, Pargna Dharampur, Near HUL Material Gate, Baddi, Kunjal, Solan, Himachal Pradesh.	Mr. Rohit Sarmalkar Whole Time Director	Email: rohit.sarmalkar@schott-Poonawalla.com
	Mr. Ajit Kumar Director - Operations	Email:ajit.kumar@schott-Poonawalla.com
	Mr. Satish Kumar Deputy Manager - HR	Email: satish.kumar@schott-Poonawalla.com

- iv. If you have reason to believe that any Director of the Company who is a Member of Whistle Blower Committee is involved in the alleged wrongful conduct, you may report your complaint to Mr. Ashok Saxena, Managing Director at [ashok.saxena@schott-poonawalla.com](mailto:ashok.saxena@schott-poonawalla.com).
- v. To build and strengthen a culture of transparency and trust in the organization.

#### **b. Disclosure Investigation**

The Whistle Blower Committee, upon receipt of disclosure, shall investigate the complaint/s to ascertain its genuineness and veracity. Based on the outcome of such investigation, within 30 days of the receipt of disclosure, the Whistle Blower Committee shall recommend a corrective action to the Management including but not limited to:

- i. Closing the complaint if wrongful conduct remains largely unsubstantiated or
- ii. Initiating action against concerned person if complaint found correct on investigation or

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- iii. Recommending installation of a proactive system to overcome system weakness/making it more stringent. Management, on the basis of the recommendation of the committee, shall take appropriate action immediately.

**c. Whistle Blower Committee**

Whistle Blower Committee members, as mentioned in Table ‘S’, shall be selected keeping in view, following criteria:

- i. Mature, well informed and trained persons.
- ii. Ability to intelligently analyze the facts of the complaints.
- iii. Ability to deter mischief mongers by asking for critically important information in an affable style.

**a. Confidentiality**

Disclosure of wrongful conduct may be submitted on a confidential basis or may be submitted anonymously. Such disclosures will be kept confidential to the extent possible, convenient with the need to conduct an adequate investigation, however complainants name shall not be revealed.

**b. Protection Against Victimization**

No adverse action shall be taken against an employee or business associate in “Knowing Retaliation”, who makes any good faith disclosure of suspect wrongful conduct to the Whistle Blower Committee.

No supervisor or any other employee with authority to make or materially influence significant personnel decisions shall take or recommend an adverse personnel action against an employee or business associate in “knowing retaliation” for disclosing wrongful conduct in good faith. Any supervisor or employee found to have so violated this Policy shall be subject to disciplinary action, in accordance with existing rules,policies, and procedures of the Company.

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**c. Whistle Blower Complaint**

No later than 30 days after a current or former employee / business associate is notified or becomes aware of an adverse personnel action against him / her, he or she may protest the action by filing a written complaint with anyone in the committee if the employee believes the action was based on his or her prior disclosure in good faith, of an alleged wrongful conduct.

The Whistle Blower Committee on receipt of such complaint, shall review the complaint expeditiously to determine the genuineness and veracity and within 30 days shall notify the Management and the complainant of the result of the review and whether the adverse personnel action is affirmed, reversed or modified. In case the Whistle Blower Committee finds the complaint, not pursuant to this policy, the employee shall be referred to other available grievance processes to pursue the complaint.

**d. Legitimate Employment Action**

This policy may not be used as a defense by an employee against whom an adverse personnel action has been taken for legitimate reasons or under company rules and policies. It shall not be a violation of this policy to take adverse personnel action against an employee whose conduct or performance warrants that action, separate and apart from that employee making a disclosure.

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