



Whistle Blower Policy

Policy Number	INDO-MIM/P/HR/19	Effective date	12.04.2018
Revision	01	Amendment date	01.07.2023
Previous revision date	12.04.2018	Next review date	01.07.2025
Process owner	HR/ Company Secretary	Email ID	hrgre@indo-mim.com
In case of any doubts, clarifications or grievances on this policy, please write to above mentioned email IDs.			

Objective & Commitments:

The INDO-MIM is committed to the highest possible standards of ethical, moral and legal business conduct through the ethical behaviour of its employees and the proper and effective functioning of its accounting and control system. In keeping with this commitment, and the commitment to open communication and transparency, This policy aims to provide an avenue for employees to report concerns about corporate conduct with the reassurance that they will be protected from reprisals or victimisation for whistleblowing in good faith.

The mechanism provides adequate protection against victimization of employee or director or suppliers and also provide for direct access to the Counsellor and Chairman of the Company in exceptional cases. This neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations about a personal situation.

Policy Application:

This policy applies to all INDO-MIM employees, including part time, temporary and contract employees, shareholders and family members, as well as suppliers, business partners and others, to report any concerns about our business practices or conduct.

Policy Scope:

This policy is intended to cover serious concerns that could have a large impact on INDOMIM such as that-

- could lead to incorrect financial reporting:
- are unlawful:
- are not in line with the INDO-MIM Group's policies and Code of Ethics:
- Otherwise amount to serious improper conduct.

Internal References:

- Grievance redressal policy
- Anti-corruption policy
- Anti-slavery policy
- Prevention of sexual harassment policy

Definitions:

“Counsellor” means a person appointed by the Board of the Directors of the Company for the purpose of receiving complaints and ensuring appropriate action under this Policy.

“Employee” means every employee of the Company (whether working in India or abroad).

“Protected Disclosure” means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity in relation to matters concerning the Company.

“Whistleblower” means any person who is making a a Protected Disclosure under this Polic

Scope:

The Policy is an extension of Company’s Code of Conduct for employees and covers disclosure of any unethical/ improper malpractices or events which have taken place/ suspected to take place involving:

1. Breach of the Company’s code of conduct
2. Breach of Business Integrity and Ethics
3. Breach of terms and conditions of employment and rules thereof
4. Intentional Financial irregularities, including fraud, or suspected fraud
5. Deliberate violation of laws/regulations
6. Gross or Willful Negligence causing substantial and specific danger to health, safety and environment
7. Manipulation of company data/records
8. Pilferation of confidential/propriety information
9. Gross Wastage/misappropriation of Company funds/assets

Eligibility:

Apart from the Directors and permanent Employees of the Company any other person(s) who have knowledge about the any misconduct by any employee or director or suppliers are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company.

Procedure:

- Board of Directors of the Company at their meeting held on 05.05.2014 has nominated Mr. P. Balasubramanian, CFO to act as Counsellor for the purpose of this policy.
- CFO is authorised to play the role Audit Committee for the purpose of Vigil Mechanism to whom any person may give protected disclosures.
- If the complaint is against the CFO of the company then the authorised person shall be the CEO of the company.
- If the complaint is against the CEO of the company then the authorised person shall be the Chairman of the company.
- The contact details of the Counsellor is as under:

Mr. P. Balasubramanian, CFO

Indo- MIM Pvt. Ltd., 45(P), KIADB Industrial Area, Hoskote, Bangalore 562114.

Phone +91 80 22048842, Mob - 9880185355

e-mail: CFOWB@indo-mim.com

CEOWB@Indo-mim.com

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- The Whistleblower, while submitting protected disclosure under this policy, is required to disclose his / her identity in a covering letter signed by him/her to the Counsellor. Anonymous disclosures will not be entertained. While a person can send a mail about the complaint the same will be taken cognizance of only when a physical copy is received by the Counsellor duly signed.
- Whistleblower is required to submit the disclosure in written form, either typed or hand written, in English and shall be given with available proof to the Counsellor as soon as the whistleblower comes to know about such facts.

- Counsellor shall maintain secrecy of the identity of the whistleblower and such whistleblower shall be protected against all disciplinary actions for such protected disclosure.
- Counsellor, on receipt of protected disclosure, shall verify the authenticity of the identity of the whistleblower and thereafter shall investigate about the irregularities complained of.

Investigation:

- All Protected Disclosures reported under this Policy will be investigated by the Counsellor at the earliest. If Counsellor has a conflict of interest in any such case, then he should recuse himself and refer the matter to the higher authorities. The Counsellor, as the case may be, may at their discretion, consider involving any Investigators for the purpose of investigation.
- The person against whom allegations brought (hereinafter called "Accused") will be informed of the allegations at the outset of a formal investigation and shall be given opportunities for providing evidence.
- Accused / Whistleblower shall be duty bound to co-operate with the Counsellor in any of the Investigation process.
- Accused as well as Whistleblower have a right to be informed of the outcome of the investigation.

In exceptional cases, where the Whistleblower / accused is not satisfied with the outcome of the investigation and the decision of the Counsellor, he/she can make a direct appeal to the Chairman of the Company.

Protection:

- No unfair treatment will be meted out to a Whistleblower by virtue of his/her having reported a Protected Disclosure under this Policy.
- The identity of the Whistleblower shall be kept confidential.
- Any person assisting in the said investigation shall also be protected to the same extent as the Whistleblower.

Disciplinary Action For False Allegation:

- It will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.

- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus or with a *mala fide* intention.

Decision:

If an investigation leads the Counsellor to conclude that an improper or unethical act has been committed, the Counsellor shall recommend to the management of the Company to take such disciplinary or corrective action as he feels appropriate.

Reporting:

The Counsellor shall submit a report to the Board on timely basis about Protected Disclosures referred to him since the last report together with the results of investigations, if any.

Amendment:

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

If you feel that any part of this policy is not in congruence to Indo-MIM values or if you want to share any suggestions or potential improvements, please feel free to write to hrgre@indo-mim.com.

Approved by: Balasubramanian P Chief Financial Officer	
	