

# JAY SHREE TEA & INDUSTRIES LIMITED

## I. WHISTLEBLOWER POLICY

### a) Philosophy

It is our belief that every employee is a trustee of its stakeholders and must adhere to the Company's Code of Conduct and conduct himself or herself at all times in a professional and ethical manner.

### b) Purpose

The "WHISTLEBLOWER POLICY" encourages Directors and employees (hereinafter referred to as employees) to bring to the Company's attention, instances of unethical behavior, actual or suspected incidents of fraud or violation of the code of conduct that could adversely impact the Company's operations, business performance and/ or reputation. The Company will investigate such reported incidents in an impartial manner and take appropriate action to ensure that the requisite standards of professional and ethical conduct are always upheld.

### c) Policy

- To establish a vigil mechanism where every employee feels free secure to report specific incidents of unethical behavior actual or suspected incidents of fraud or violation of the company's code of conduct.
- To investigate reported incidents in a fair manner.
- To take appropriate disciplinary action against the delinquent employee(s).
- To ensure that no employee is victimised or harassed for bringing the incidents to the attention of the Company.

The practice of this Policy will be overseen by Audit Committee.

#### **d) Reporting Mechanism**

i) Employees are encouraged to bring to the attention of the Company incidents pertaining, inter alia, to:

- Conflict of interest with the Company
- Violation of any law or regulation including actual or suspected fraud.
- Illegal or unethical conduct including that which adversely affects investors, shareholders customer, suppliers, other employees, or the business performance or image or reputation of the Company,
- Leaking of confidential or proprietary information of the Company

ii) A whistleblower complaint may be made by any employee(hereinafter referred to as the complainant) in good faith having reasonable grounds in writing specifying the nature and description of the violation and documents that would prove or relate the violation to his or her immediate reporting authority. Complaint by or against senior management should be made to the Chairman of the Audit committee.

iii) The complaint shall be made in writing and must include as much information about suspected violation as the complainant can provide. It should describe:

- The nature, period of commission and details of the alleged violation;
- The identities of the persons suspected to have committed the alleged violation; and
- A description of the documents that would prove or relate to the suspected violation.

Employees are encouraged to report such incidents as early as possible, of the suspected violation / breach noticed by him/ her, so that timely action can be taken.

#### **e) Investigation**

i) On receipt of complaint(other than by or against senior management),the immediate reporting authority will make necessary assessment on being satisfied to the seriousness and credibility of the complaint, direct the complaint for investigation, in consultation with the Head of the Internal Audit department of the Company.

ii) All information disclosed during the course of an investigation, including the identity of the complainant, shall be kept confidential except as necessary or appropriate disclosure required for the purposes of the investigation or where required to be statutorily disclosed.

iii) Upon completion of the investigation, the findings shall be reported by the Head of Internal Audit department to the Management of the Company.

iv) If the Management / Audit Committee find that a violation has occurred, the Company shall take appropriate action which may include disciplinary proceedings against the violator.

#### **f) No Retaliation**

- The Policy is intended to encourage and enable employees to raise bonafide concerns. No employees who reports a violation shall suffer any harassment, retaliation or adverse employment condition as a consequence of such reporting.

- Any employee who retaliates against a person reporting a violation will be subject to disciplinary proceedings.

#### **g) Compliant to be made in good faith**

- A complainant must act in good faith and have reasonable grounds for forming a belief that his or her complaint constitutes a violation.

- This policy must not be used as a tool for victimization, making false allegation or acting malafide.

- Any person who is found to be making baseless, reckless malicious or deliberately false allegation, shall be subjected to disciplinary proceedings.