



Internal Memo

Whistle Blower Protection Policy For Vendors

Definitions:

- "Vendor Whistle Blower" means a person/organization registered in Vendor Data Base of the Company, making a Protected Disclosure and thereafter extending whatever assistance required in establishing the facts mentioned in the Disclosure.
- "Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith that discloses information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature by any other person or vendor.

Procedure:

- Protected Disclosures should preferably be reported in writing i.e. in ink or electronically and should be factual (not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower.
- Protected Disclosures should be reported to Ethics Counsellor..

Protection to the Whistle Blower:

- The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Whistle Blowers while conducting business with the Company.
- The Whistle Blower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/orders, refusal of issuing 'RFQ (Request For Quotation)' to them, or any direct or indirect use of authority to obstruct the Whistle Blower to continue to execute their jobs including making further Protected Disclosure.
- COO and the Chief/ Head of the concerned user departments shall ensure that the Vendor is provided all assistance required to execute the existing orders.
- Under no circumstances, subjects against whom the disclosures have been made should compel investigator to disclose the identity of the Whistle Blower.

Disqualifications:

Any abuse of this protection by vendors will warrant disciplinary action.



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Vendor Whistle Blower Protection Committee:

The Company has constituted the Vendor Whistle Blower Protection Committee as under:

Mr. Hemant Kharkar	COO	Chairman
Mr. Ashim Roy	GM (Finance & Accounts)	Member
Mr. P K Tibdewal	Chief BMHE and P&YE	Member
Mr. Mukesh Prasad	Ethics Counsellor	Convener

In case a Whistle Blower feels that they have been victimized because of reporting about an unethical act then they can submit a 'Grievance' to the Ethics Counsellor, giving specific details of nature of victimization allegedly suffered by them. All such grievances will be forwarded to the above committee for their examination. The Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

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.

Notification to this Policy:

Chief BMHE and P&YE shall ensure that the approved copy of this policy and its subsequent amendments if any are notified to all the Vendors engaged in business with the Company.


6/7/2011
(Sudhir Deoras)

Managing Director