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Whistle Blower Policy


ISSUE : 1

REVISION : 0

ISSUED Date : 1/4/2023

AUTHORIZED BY : CE (Systems)

REVISION DETAILS

REV NO / DATE	DESCRIPTION	SIGNATURE
00 / 01/04/2023	New Issue	

Whistle Blower Policy

Applicability:

The policy is applicable to all stakeholders, including directors and employees.

Objective:

To provide the Whistle Blowing mechanism to get the right information to the right people to counter wrongdoing and promote proper, effective, and efficient operation of all its functions.

Purpose:

To encourage the Directors and employees to provide feedback and speak up with any suggestions or concerns about the conduct of business as responsible corporate citizens within the applicable legal framework in place from time to time.

Meaning:

Whistleblowing is the lawful disclosure of information, a discloser reasonably believes and /or evidences the wrongdoing to an authorized recipient.

Procedure:

The Whistle-blower can make a Protected Disclosure by reporting to:

- 1) The CEO or
- 2) The Directors or
- 3) The CE (Systems) or
- 4) The Occupational Health & Safety Committee.

The Whistle-blower can either disclose their identity or file an anonymous complaint.

Anonymous complaints will be investigated **ONLY** if the Company considers that adequate data, facts and evidence is provided to progress the complaint.

The Occupational Health & Safety Committee shall ensure investigations of Protected Disclosures in a timely and fair manner.

The investigation shall be completed normally within 90 calendar days of receipt of the Protected Disclosure, except in highly complex cases which require external investigation.

Protected Disclosures should be factual and not speculative and should contain as much specific information as possible to allow for proper assessment and investigation.

The Whistle-blower's role is that of a reporting party with reliable information. They are expected to participate as and when required in the investigation.

Protected Disclosure(s) pertaining to sexual harassment should be made in writing. These disclosures should be made to the Occupational health & Safety Committee directly. If received through the whistle-blower mechanism, then the complaint will be forwarded to the Occupational health & Safety Committee.

Disqualification:

The Company reserves the right to investigate matters related only to the violation of Company Policies or Code of Conduct, thru Whistle Blower Mechanism.

Complaints made without the following mandatory information.

Name, designation, and location of the Subject(s)

Detailed description of the incident

Location and time/duration of the incident

Specific evidences or source of evidences, shall be treated as Frivolous complaints and shall not be investigated.

Protection:

- a. No unfair treatment would be meted out to a Whistleblower(s) by virtue of their having reported a Protected Disclosure under this Policy.
- b. Any other Director or Employee assisting in the said investigation shall also be protected to the same extent as the Whistle-blower(s).
- c. The identity of the Whistle-blower(s) shall be kept confidential unless otherwise required by law, in which case the Whistle-blower(s) would be informed accordingly.
- d. While it would be ensured that Whistle-blower(s) are accorded complete protection from any kind of unfair treatment, any abuse of this protection would warrant disciplinary action.
- e. Protection under this Policy would not mean protection from disciplinary action arising out of involvement of the complainant in any misconduct or false or bogus allegations made by a Whistle-blower(s) knowing it to be false or bogus or with a mala fide intention.

Investigation:

A preliminary review will be performed for all Protected Disclosure(s) reported under this Policy. Based on the findings of the preliminary review, the decision for thorough investigation will be taken by the Occupational health & Safety Committee

The Committee may at their discretion, consider involving any internal or external Investigators for the purpose of investigation, depending upon the circumstances or severity of the Protected Disclosure.

Committee decision to conduct an investigation is by itself not an accusation and should be treated as a neutral fact finding process. The outcome of the investigation may or may not conclude that an improper or unethical act was committed.

The identity of a Subject and the Whistle-blower would be kept confidential to facilitate effective conduct of the investigation.

Subjects shall have a duty to co-operate with the Committee and not to interfere in the investigation. However Subject would be given the opportunity to respond to material findings of an investigation report. No representative of the Whistle-blower, whether legal or otherwise would be permitted to attend the investigation. No allegation of wrongdoing

against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.

Subjects and whistle-blowers have a right to be informed about the outcome of the investigation if the allegation is proved.

Decision:

If an investigation leads the Occupational health & Safety Committee to conclude that an illegal or unethical behavior, fraud or violation of the Company's Codes or Policies or any improper activity has taken place or has been committed, Occupational health & Safety Committee shall in conjunction with the CEO of the Company agree on the disciplinary or corrective action that needs to be taken. The action will be implemented by the Management of the company.

Protection:

No unfair treatment would be meted out to a Whistle-blower(s). The Company, as a Policy, condemns any kind of discrimination, harassment, victimization, or any other unfair employment practice being adopted against the Whistle-blower(s). Complete protection would, therefore, be given to the Whistle-blower(s) against any unfair practice like retaliation, threat or intimidation of termination or suspension of service, transfer, demotion, refusal of promotion etc., including any direct or indirect use of authority to obstruct the Whistle-blower's right to continue to perform his duties or functions including making further Protected Disclosure.

Retention of document:

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of seven years.

Approved By:



Date: 01/04/2023