



## Whistle-Blower Policy/ Vigil Mechanism Policy

### 1. Background

JSW STRUCTURAL METAL DECKING LIMITED (JSWSMD) believes in conducting its affairs in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behaviour. JSWSMD is committed to ensuring that we act at all times with integrity and maintain the highest standards of corporate ethics in all areas of our operation. To achieve this, the management wishes to encourage effective and honest communication and are committed to a robust response to any malpractice brought to its attention.

Employees have a role and responsibility in pointing out such violations. This policy is formulated to provide a secure environment and to encourage employees of JSWSMD to report unethical, unlawful or improper practices, acts or activities in the Group or any of its companies in India and to prohibit managerial personnel from taking any adverse personnel action against those employees who report such practices in good faith.

### 2. Policy & Applicability

Every employee at JSWSMD is expected to promptly report to the management any actual or possible breach of our ethical standards or any other unlawful or unethical or improper practice or act or activity. Integrity is one of our core values and the highest standards of conduct and business integrity are expected from every employee.

If you have concerns that someone's conduct is, or could be, falling short of what we expect, we want you to speak up about it. We understand that this can be a difficult thing to do and this policy aims to reassure you that anyone who reports, in good faith, any form of malpractice or behaviour which falls short of an acceptable standard, will be protected.

The unlawful or unethical or improper practice or act or activity (hereinafter referred to as an "alleged wrongful conduct") may include, but is not limited to, any of the following:

- ✚ A violation of any law including bribery, corruption, fraud or theft.
- ✚ Misuse or misappropriation of JSWSMD assets
- ✚ Gross waste of or misuse or misappropriation of JSWSMD funds
- ✚ A substantial and specific danger to health and safety or the environment
- ✚ An abuse of authority
- ✚ Any victimisation, harassment, discrimination or act of abuse towards any other employee
- ✚ Concealing or ignoring any of the above.

This policy applies to all employees within JSWSMD. The reporting channels and procedures are also available to temporary workers, agency staff, secondees, external consultants and contractors whilst they are working for JSWSMD.

No manager, director, department head, 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 in knowing retaliation for a disclosure of information, made in good faith, about an alleged wrongful conduct.

### **3. Roles, Rights and Responsibilities of Whistle-Blowers**

- ✚ Whistle-Blowers provide initial information based on a reasonable belief that an alleged wrongful conduct has occurred. The motivation of a whistle-blower must be for the rightful concerns of employees and the company and not for malicious reasons.
- ✚ Whistle-Blowers shall refrain from obtaining evidence for which they do not have a right of access.
- ✚ Whistle-Blowers should be candid with the members of the Top Management Committee or others to whom they make a report of alleged improper activities and provide all known information regarding any reported allegations.
- ✚ Anonymous whistle-blowers need to provide sufficient information to support the commencement of an investigation. Because investigators are unable to interview anonymous whistle-blowers, it may be more difficult to evaluate the credibility of the allegations and, therefore, less likely to cause an investigation to be initiated.
- ✚ Whistle-Blowers are “reporting parties,” not investigators. They are not to act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the investigating authority.
- ✚ The identity of the whistle-blower will not be disclosed except where required under the law or for the purpose of the investigation. The whistle-blower should feel comfortable that his/ her interests will be protected.
- ✚ A whistle-blower’s right to protection may not extend to immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation or any other misconduct or wrong doing.
- ✚ This policy may not be used as a defence by an employee against whom an adverse personnel action has been taken for legitimate reasons or cause 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.

#### **4. Procedures - For Making a Disclosure**

- ✚ Any employee who observes or has knowledge of an alleged wrongful conduct shall make a disclosure to All complaints in this regard are to be sent to our Executive Director & CEO, Mr. Praveen Mam. He may be reached on [pmam@jswsmd.in](mailto:pmam@jswsmd.in) or +91 9930071596. The disclosure may be made in writing (by e-mail or on paper) or orally (a personal meeting or over the telephone).
  
- ✚ The Management shall appropriately and expeditiously investigate all reports received from the whistle-blower. In this regard, if the circumstances so suggest, the management may appoint a senior officer or a committee of managerial personnel to investigate into the matter.
  
- ✚ The Management shall have the right to outline a detailed procedure for an investigation.

All HODs are required to notify and communicate the existence and contents of this policy to their employees. The new employees shall be informed about the policy by the HR department.

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