

1. INTRODUCTION

The Company is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable anyone dealing with the Company to voice concerns in a responsible and effective manner. Where any person dealing with the Company discovers information which he/she believes shows serious malpractice, impropriety, abuse or wrongdoing then this information should be disclosed without fear of reprisal.

2. SPIRIT OF THE POLICY

As is well known, Company does not tolerate any malpractice, impropriety, abuse or wrongdoing and it now expects any person dealing with the Company, who has concerns to come forward and voice those concerns. This policy has been introduced by the Company to enable any person dealing with the Company to raise their concerns about any malpractice, impropriety, abuse or wrongdoing at an early stage and in the right way, without fear of victimization, subsequent discrimination or disadvantage.

3. SCOPE OF THE POLICY

This policy is designed to enable any person dealing with the Company to raise concerns internally and at a high level and to disclose information, which the individual believes shows malpractice, impropriety, abuse or wrongdoing. This policy is intended to deal with concerns which are at least initially to be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary.

4. ASSURANCES UNDER THE POLICY

The Company will not tolerate any harassment or victimization (including informal pressures) of/against the disclosing person and will take appropriate action to protect the individual when he/ she raises a concern in good faith.

5. POLICY AND PROCEDURE FOR DISCLOSURE, ENQUIRY AND DISCIPLINARY ACTION

a. What constitutes Malpractice, Impropriety, Abuse or Wrongdoing?

Malpractice, impropriety, abuse and wrongdoing (hereinafter referred to as "Concern") can include a whole variety of issues and some are listed below.

However, this is not a comprehensive list but is intended to illustrate the sort of issues, which may be raised under this policy.

- Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law
- Breach of any Policy or Manual or Code adopted by the Company
- Health and safety risks, including risks to the public as well as other employees (e.g. faulty electrical equipment).

- Abuse of children and vulnerable adults (e.g. through physical, sexual, psychological or financial abuse, exploitation or neglect).
- Damage to the environment (e.g. pollution).
- Fraud and corruption (e.g. to solicit or receive any gift/reward as a bribe).
- Any instance of failure to comply with legal or statutory obligation either for and on behalf of the Company or in any personal capacity in the course of discharging duties of the Company.
- Any instance of any sort of financial malpractice
- Abuse of power (e.g. bullying/harassment).
- Any other unethical or improper conduct.

b. How to disclose a Concern?

Any person intending to make any disclosure of a Concern is required to disclose all relevant information regarding the Concern in a signed written document not later than one-year of the day on which he/she knew of the Concern.

c. To whom should the concern be disclosed?

The concern should be disclosed to the Global Ombudsman, who will be appointed for all the regions.