



WHISTLE BLOWER POLICY

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1. Objective

Shivtek Spechemi Industries Ltd requires its employees and representatives to observe and maintain the highest ethical standard of business and personal conduct of their duties and responsibilities. Employees and representatives of Shivtek Spechemi Industries Ltd must practice integrity and transparency in fulfilling our responsibilities and comply with all applicable laws and industry regulations. Adherence to these principles will ensure our continued success and maintain the confidence of our customers and the communities in which we live.

2. Scope

This policy is applicable to all premises of Shivtek Spechemi Industries Ltd.

3. Applicability

- This policy is applicable to all the employees of Shivtek Spechemi Industries Ltd including trainees, contractual employees.
- This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.

4. Ownership

The administrative responsibility lies with the HR Department.

5. Exceptions Approval

Any exceptions to the guidelines need the approval of MD & CEO.

6. Guidelines

Following guidelines exist for the Whistle Blower Policy:

6.1. Actions To Report

Below are few examples, though non-exhaustive of the areas where non-compliance may be reported:

- Harassment or Discrimination & Workplace Violence
- Protection of Confidential Information and intellectual property
- Privacy breach

Shivtek Spechemi Industries Ltd

(Formerly known as Shshivtek Industries Private Limited)

CIN No. U24100DL2009PLC188730

📍 1419, DLF Corporate Green Tower 1, Sector 74 A, Southern Peripheral Road (SPR), Gurugram, Haryana-122004 (India).

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- Fraud or questionable accounting/financial reporting
- Corruption and improper transactions
- Improper promotion and improper sales practices
- Conflicts of Interest
- Environmental Health and Safety issues
- Insider Trading
- Anti-competitive behaviour
- Theft, misuse of company's assets
- Retaliatory action as mentioned in this policy
- Any Illegal or unethical Practices

6.2. Channels of Raising Concerns

- An employee who comes to know or observes himself/ herself of any unethical & improper practices or alleged wrongful conduct, shall make a disclosure to the HR & Admin in writing through letter or e-mail to hr@shiva-group.com as soon as possible but not later than 45 consecutive calendar days after becoming aware of the same.
- If the employee is unwilling or unable to put a disclosure in writing, he may approach the HR directly or through his superior or any other employee.

6.3. Investigation and Disciplinary Action

- The HR & Admin shall prepare a written summary of the employee's disclosure and provide a copy to the employee, Director – Enablement Function and Chairman of the company.
- The case shall be reviewed by the Code of Conduct Enforcement Committee (CCEC) comprising of Manager – Legal & Compliance, Director – Enablement Functions and one of members of the Management Committee to appropriately and expeditiously investigate all whistle blower reports received detailing the procedure for the investigations (if required).
- The Committee shall have the right to call for any information or document and interrogation of any employee of the company or other person(s) as they may deem appropriate for the purpose of conducting investigation under this policy.
 - A report shall be prepared after completion of Investigation and the HR & Admin shall consider the same and report the matter to the Chairman.

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- After considering the report, the Committee shall inform the Chairman the cause of action and order for remedies.
- Under exceptional circumstances, the employees could also directly report the matter to the Chairman and the Chairman would then take necessary action on the same as he deems fit.
- No personnel action shall be taken or recommended against an employee in retaliation to his or her disclosure in good faith of any unethical & improper practices or alleged wrongful conduct. This policy protects such employees from unfair termination and unfair prejudicial employment practices
- This policy does not protect an employee from an adverse action which occurs because of poor job performance or any other misconduct unrelated to a disclosure made pursuant to this policy, etc. independent of his disclosure of unethical & improper practices or alleged wrongful conduct.

6.4. Protection of Whistle Blower

- Identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law.
- Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.
- No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers.
- Complete protection will be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his/ her duties/functions including making further Protected Disclosures.
- Shivtek Spechemi Industries Ltd will take steps to minimize difficulties which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure etc.
- A Whistle Blower may report any violation of the above clause to the Chairman or Function Head, who shall investigate into the same and recommend suitable action to the management.

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- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection will warrant disciplinary action.
- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

For Shivtek Spechemi Industries Ltd

Mrs. Kashiish A Nenwani

(Director & COO)

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