



WHISTLE BLOWER POLICY



What is Whistleblowing and why is it required?



A Whistleblower

Is one who : “Raises the Alarm”

Exposes misconduct

Calls attention to a wrong practice occurring in an organization



Famous Whistleblowers



Sherron Watkins



Myron Mehlman



Cynthia Cooper



Satyendra Dubey

Why was the Whistleblower Policy introduced?

The Murugappa Group believes:

“The fundamental principle of economic activity is that no man you transact with will lose; then you shall not.” - Arthashastra

In keeping with this, the Group adheres to stringent Corporate Governance norms.

This includes promoting the highest levels of transparency and accountability to all stakeholders.

The WB mechanism is an independent and safe communication channel to raise serious concerns that stakeholders may have.

Who does the Policy cover?

The Policy covers all Murugappa Group companies including Associate Companies and Joint Ventures.

Its scope extends to all stakeholders both internal and external.



Employee



Customer



Supplier



Contractor

**What kind of
concerns
should I
report as a
WB?**



What kind of concerns should I report ?

Serious concerns (actual or suspected) that could have a large impact on the organization.

Such actions that :

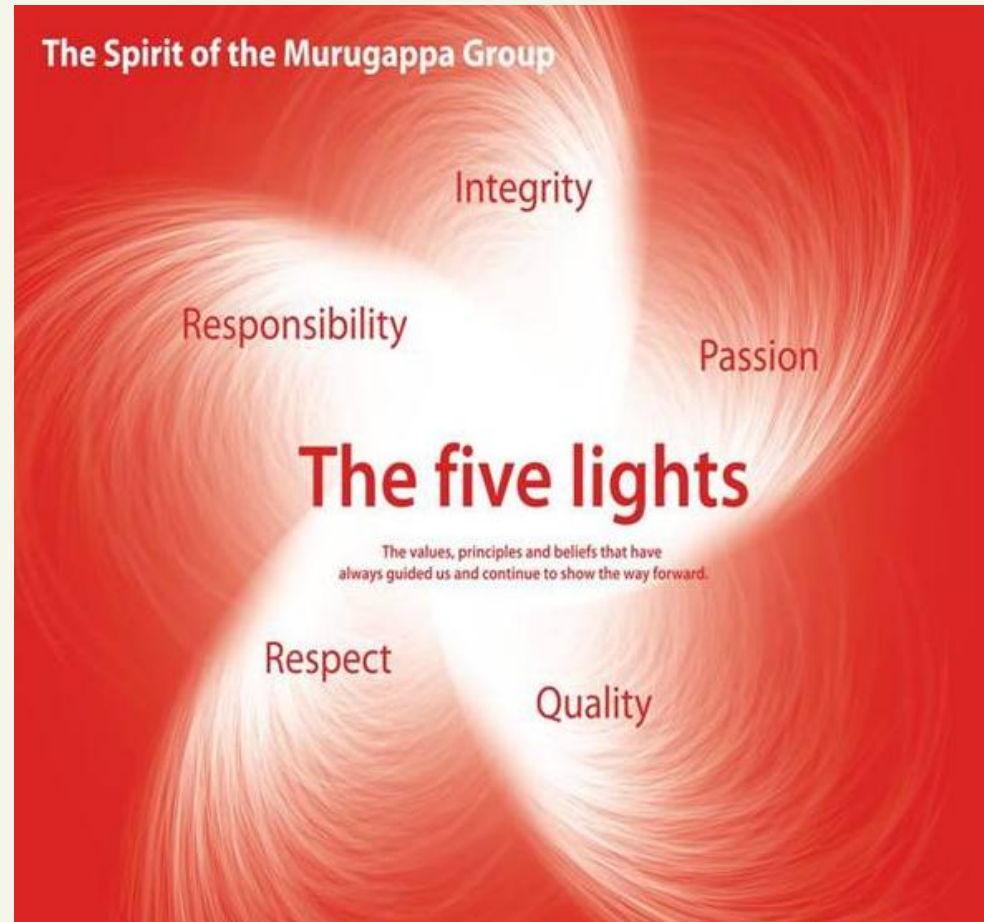
- May lead to incorrect financial reporting
- Are not in line with applicable company policy
- May be detrimental to the image of the group
- Violate the accepted values of the group
- Are unlawful or
- Otherwise amount to serious improper conduct
(including any kind of harassment)

It is not intended for petty and malicious allegations.

Why should I report ?

In order to alert management in advance and help prevent an organizational lapse.

To uphold our Group's fundamental values and beliefs as enshrined in 'The Five Lights'.



What safeguards do I have, if I report ?

- The Statutory Board, through the Managing Director, in adopting the policy, stands guarantee that there will be no victimization of the whistleblower.
- Therefore, safeguarding the whistleblower against harassment is a key feature of the policy.
- In the view of the organization, those who raise concerns display dedication, integrity and commitment towards the organization.

Whom should I report to?

The Ombudsman!

The person who receives all complaints under this policy and ensures appropriate action.

Selected for his integrity, independence and fairness.

Authorized by the 'Board of Directors' of the Company

Who is the Ombudsman?



Mr Shyam C Raman

Executive Vice President – Group HR

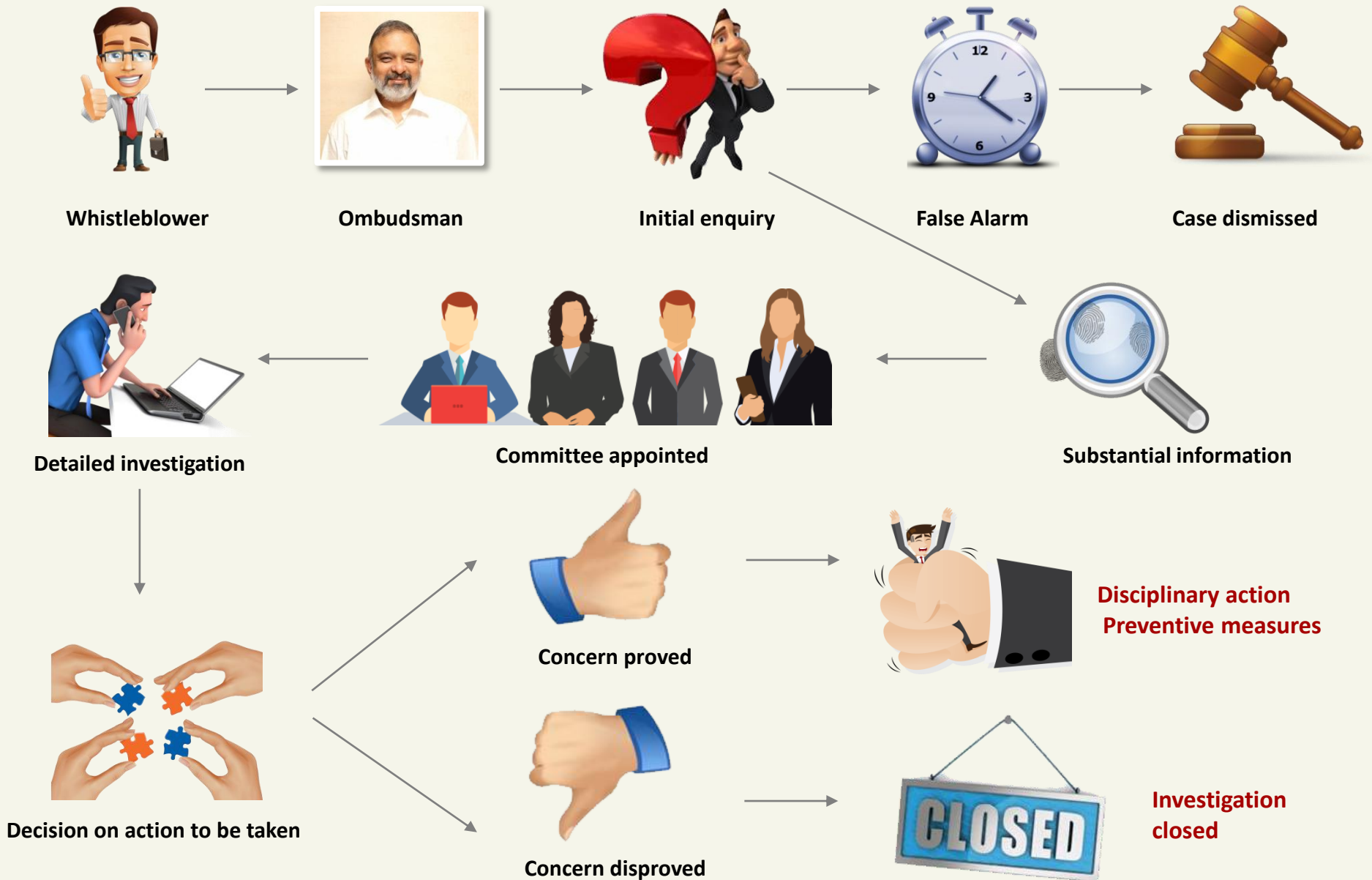
Direct line: 044 25306444

Mobile No: 99400 45453

E-mail: ombudsman@corp.murugappa.com

How does it work?





There's communication flow back to the whistleblower at appropriate stages

Frequently Asked Questions





Frequently Asked Questions

Q Do I have to submit my complaint in writing?

A *No, this is not necessary. A verbal communication on phone will also suffice. However you would have to confirm your identity.*

Q Can I make an anonymous complaint?

A *No, this is not permitted. Follow-up questions and investigation may not be possible unless the source of information is identified.*



Frequently Asked Questions

Q It's only a suspicion, I don't have evidence. Can I complain?

A *Yes, you can. However you need to give a clear explanation about your concerns.*

Q Will my identity as a complainant be kept confidential?

A *Every effort will be made to protect your identity. Also, as stated earlier, the complainant is fully safe-guarded against any harassment or victimisation.*



Frequently Asked Questions

Q What if I am wrong?

A *This is possible. The investigation would establish the final result. However a negative result does not in any way compromise the complainant, where the complaint is made in in good faith and is not made maliciously or for personal gain.*

Q How soon will action be taken?

A *Investigation would begin immediately. Depending on the nature of the complaint, time to final action could take up to a maximum of 8-10 weeks.*



Frequently Asked Questions

Q I have existing channels for communicating in my own company, why should I go to the Ombudsman?

A *The Whistleblower policy provides an additional communication channel to supplement those which may exist within the company. It is not necessary that serious concerns be raised to the Ombudsman alone. However the Ombudsman remains available to all, as a neutral person external to the individual Companies. A concern can also be referred to him in case no action has been taken after raising the concern within the Company.*



Frequently Asked Questions

Q It is not my problem, why should I bother?

A *It is your duty as a responsible and committed employee of your Company. You could help prevent lapses which could have far-reaching implications for the whole organization and all its stakeholders.*

Q What if the person I am complaining about is my own boss?

A *This is the reason why a neutral Ombudsman has been appointed, who is external to the Company and therefore unbiased.*



Frequently Asked Questions

Q Who will decide on the action to be taken ?

A *The Ombudsman is authorized to investigate the complaints falling within the scope of this policy and this may be done by him independently or through a committee appointed by him. The Ombudsman/Committee would recommend the action to be taken, including dismissal if required.*

Thank you!