

# **Whistle Blower Policy**

## PREFACE

- a. The Company believes in the conduct of the affairs of the constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour.
- b. The Company is committed to develop a culture where it is safe for all the employees to raise concerns about any poor or unacceptable practice or any event of misconduct.
- c. The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It is to protect the employees who are willing to raise a concern about serious irregularities within the Company.
- d. This Policy neither releases employees from their duty/responsibility of confidentiality in the course of their work, nor is it a route for taking up a grievance of a personal situation.

## POLICY

This policy is for the Employees of the Company as defined hereinafter:

## DEFINITIONS

All the location & department will initiate through HR.

- a. **Alleged Wrongful Conduct :** Alleged wrongful conduct shall mean violation of Law, infringement of Company's code of conduct or ethic policies, mismanagement, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority. In case of Data Integrity, wrongful conduct means violation of written procedures and general Good Documentation Practices that may cause falsification of data (Raw data/Original Records).
- b. **Company:** Company means 'AMANTA HEALTHCARE LTD.'
- c. **Compliance Officer:** A Compliance Officer is an employee whose responsibilities include ensuring that employee does not contravene any statute or regulations.

- d. **Disciplinary Action:** Disciplinary Action means any action that can be taken on the completion of/during the investigation proceedings including but not limiting to a warning, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
- e. **Employee:** Employee means every employee of the Company (whether working in India or abroad).
- f. **Protected Disclosure:** Protected Disclosure means a concern raised by an employee in the form of a written communication made in good faith that discloses or demonstrates information that may evidence falsified data/Information or any wrongful act that may lead to falsification (such as undue pressure by superiors).
- g. **Subject:** Subject means a person(s) against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.
- h. **Whistle Blower (s):** Whistle Blower(s) is/are someone who makes a Protected Disclosure under this Policy.
- i. **Whistle Officer (s):** "Whistle Officer (s)" is /are person (s) who is / are nominated / appointed to conduct detailed investigation and submit findings to the Ombudsperson.
- j. **Ombudsperson:** Ombudsman person will be a Senior Person for the purpose of receiving all complaints under this Policy and ensuring appropriate action. In the first instance, the Management shall appoint this ombudsperson. The Management shall have the authority to change the Ombudsperson from time to time.

## **THE GUIDING PRINCIPLES**

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

- a. Ensure that the Whistle Blower (s) and/or the person processing the protected Disclosure is not victimized for doing so;
- b. Treat victimization as a serious matter including initiating disciplinary action on such person/(s) who may attempt to victimize the whistle-blower (s);
- c. Ensure complete confidentiality;
- d. Not attempt to conceal evidence of the Protected Disclosure;

- e. Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made;
- f. Provide an opportunity of being heard to the persons involved especially to the Subject;
- g. In case, the concern raised by the whistle blower turns out to be inadequate/ inappropriate/ incorrect/ lacking evidence, the whistle officer and ombudsman shall decide if any action is required to be taken against the whistle blower. It is important not to discourage the employees from raising concerns.

### **COVERAGE OF POLICY/WHAT TO REPORT**

- a. The Policy covers malpractices and events which have taken place/ suspected to take place involving:
  - Abuse of Access to Data, Records, Documents
  - Negligence causing substantial and specific danger to data record, Product quality.
  - Manipulation of company data/records
  - Data irregularities, including fraud, or suspected fraud of data, records, documents.
  - Breach of Code of Conduct/for Data Integrity
- b. Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

### **DISQUALIFICATIONS**

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

- c. Whistle Blower(s), who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable for disciplinary action under Company's Code of Conduct.

### **MANNER IN WHICH CONCERN CAN BE RAISED**

- a. Employees can make Protected Disclosure to Ombudsperson, as soon as possible but not later than 15 consecutive days after becoming aware of the same. This timeline should not be breached by the Employees while making such Disclosures.
- b. Notwithstanding the above, in the genuine case(s) where the Ombudsperson is convinced that due to reason(s) which are noteworthy to give consideration, may take up the allegations for primary investigation, despite the fact that the time limit specified above has exceeded.
- c. Whistle Blower(s) must put his/her name and signature to allegations. Concerns expressed anonymously WILL NOT BE investigated. The allegations without name and signature will not be considered by the Ombudsperson.
- d. The allegations brought before the Ombudsperson will be taken up for primary investigation within 15 consecutive days from the date of receipt of such Disclosures.
- e. If initial enquiries by the Ombudsperson indicate that the concern has no basis, or it is not a matter to be investigated or pursued under this Policy, it may be dismissed at this stage itself and the decision is documented. In all such cases, the Ombudsperson will provide these details before the Board.
- f. Where initial enquiries indicate that further investigation is necessary, this will be carried through either by the Ombudsperson alone, or by a Whistle Officer(s)/Committee nominated by the Ombudsperson for this purpose.
- g. The investigation would be conducted in a fair manner, as a neutral fact finding process and without presumption of guilt. A written report of the findings would be made not later than 15 days from the commencement of such initial enquiry.
- h. Name of the Whistle Blower(s) shall not be disclosed to the Whistle Officer (s)
- i. The Ombudsperson/Whistle Officer (s) shall Make a detailed written record of the Protected Disclosure. The record will include:

- a. Facts of the matter
  - b. Whether the same Protected Disclosure was raised previously by anyone, and if so, the outcome thereof;
  - c. Whether any Protected Disclosure was raised previously against the same Subject;
  - d. Findings of Ombudsperson/Whistle Officer(s)
  - e. The recommendations of the Ombudsperson/Whistle Officer(s) on disciplinary/ other action/(s).
  - f. The Whistle Officer(s) shall finalize and submit the report to the Ombudsperson within 15 days of being nominated/ appointed. On submission of report, the Whistle Officer(s) shall discuss the matter with Ombudsperson who shall either:
    - a. In case the Protected Disclosure is proved, accept the findings of the Whistle Officer(s) and take such Disciplinary Action as he may think fit and take preventive measures to avoid reoccurrence of the matter within 7 days from the receipt of such report from the Whistle Officer(s);
    - b. In case the Protected Disclosure is not proved, extinguish the matter not later than 7 days from the receipt of such report from the Whistle Officer(s);
- Or**
- c. Depending upon the seriousness of the matter, the Ombudsperson may refer the matter to the Management with proposed disciplinary action/counter measures.
  - g. In exceptional cases, where the Whistle Blower(s) /Subject is not satisfied with the outcome of the investigation and the decision, he/she can make a direct appeal to the Chairman within 15 days from the receipt of such outcome.
  - h. How to Report: The whistle blower has to submit the 'Protected Disclosure' form to Ombudsperson and the Ombudsperson is:

Name: Mr. ---

Concerns can be posted to the Ombudsperson, to the below mentioned details:

Postal Address:

- i. **Whistle Officer / Ombudsperson to keep all data connected with the investigation report in strictly confidential and ensure that all information should be available in electronic data under password and stored in a secured manner.**

## **PROTECTION**

- a. No unfair treatment will be meted out to a Whistle Blower(s) 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 the Whistle Blower. Complete protection will, therefore, be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour or the like, including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his Duties/functions including making further Protected Disclosure.

The Company 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(s) is/are required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower(s) to receive advice about the procedure, etc.

- b. The identity of the Whistle Blower(s) shall be kept confidential.
- c. Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as that of the Whistle Blower (s).

## **SECRECY/CONFIDENTIALITY**

- a. The Whistle Blower(s), the Subject, the Whistle Officer(s) and everyone involved in the process shall:
  - Maintain complete confidentiality/ secrecy of the matter
  - Not discuss the matter in any informal/social gatherings/ meetings
  - Discuss only to the extent or with the persons required for the purpose of completing the process and investigations
  - Not keep the papers unattended anywhere at any time
  - Keep the electronic mails/files under password and stored in a secure manner.
- b. If anyone is found not complying with the above, he/ she shall be held liable for such disciplinary action as is considered fit.

## **REPORTING**

A quarterly report with number of complaints received under the Policy and their outcome shall be placed before the Audit Committee and the Board.

## **NOTIFICATION**

All the department heads are required to notify and communicate the existence and contents of this policy to the employees of their department. Every departmental head shall submit a certificate duly signed by him to the compliance officer that this policy was notified to each employees of his department. The new employees shall be informed about the policy by the HR department and statement in this regard should be periodically submitted to the Compliance Officer.

## **AMENDMENT**

The Management has the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever. It is mandatory for each employee to go through the policy in detail for a clear understanding of all aspects of the policy.



## Protected Disclosure Form

For Employees of AMANTA HEALTHCARE LTD.:

I hereby declare, that the accompanying statements and supporting documentation (if any) is true and correct, to the best of my knowledge and in complete good faith.

Name of the Whistle Blower(s) : \_\_\_\_\_  
Designation : \_\_\_\_\_  
Department/ Division : \_\_\_\_\_  
Location : \_\_\_\_\_  
Date of Joining : \_\_\_\_\_  
Contact Number : \_\_\_\_\_  
E-mail : \_\_\_\_\_  
Correspondence Address : \_\_\_\_\_

Nature of SOP/ "Code of Conduct" Violation : \_\_\_\_\_  
Sequence of events (please provide Date/Time/Place) : \_\_\_\_\_  
Source of Information : \_\_\_\_\_  
Role of the Subject(s) : \_\_\_\_\_  
Other individuals involved : \_\_\_\_\_  
Perceived Outcome of the Violation : \_\_\_\_\_  
Any Other information that you may like to provide : \_\_\_\_\_

List of Attachments:

1..... 2.....  
3..... 4.....

**Signature of the Whistle Blower(s)** : \_\_\_\_\_

**Date** : \_\_\_\_\_

<b>Amanta Healthcare Limited, Kheda.</b>		
<b>Questionnaire</b>		
		<b>Page No. : 1 of 1</b>
<b>Employee Name</b> :	<b>Employee No</b> :	
<b>Trainer Name</b> :	<b>Department</b> :	
<b>Date</b> :		
<b>Title</b> :	<b>Code of Conduct for Data Integrity &amp; Whistle Blower Policy</b>	
<b>Total Marks</b> :	<b>Obtained Marks</b> :	<b>Percentage</b> : %
➤ <b>Each question carries equal marks. Put "v" Sign on correct answer.</b>		
Sr. No.	Question	Marks
1.	Who is nominated appointed to conduct detailed investigation and submit findings to the Ombudsperson.  (a) Whistle Blower                      (b) Whistle Officer	
2.	The Ombudsperson will be taken up for primary investigation within _____consecutive days from the date of receipt of such Disclosures.  (a) 15 days                                      (b) 20 days	
3.	Data Integrity is the consistency and accuracy of data and accurate data. (a) True                                      (b) False	
4.	_____ Shall finalize and submit the report to the Ombudsperson.	
5	_____ Team is responsible for investigating the suspected fraudulent or wrongful act. (a) Whistle Officer                      b) Data Integrity	
<b>Remarks :</b> Above mentioned candidate is <b>Qualifying / Not Qualifying</b> the test. Hence <b>he / she</b> is trained <b>Satisfactorily / Not Satisfactorily</b> . Re-training is <b>Not required / Required</b> .		
<b>Trainee Signature</b> : _____ <b>Evaluated By</b> : _____		