



Siddharth Grease & Lubes Pvt. Ltd.

Version- 1

SGLPL Whistle Blower Policy- Business Associates

Purpose:

The policy provides a platform to our Suppliers/ Service providers/ contractors/ Vendor/ Customers to disclose information, which he / she believes; shows serious malpractice, impropriety, abuse or wrongdoing (hereinafter referred to as "Concern / Disclosure") with/ within the company; without fear of reprisal or victimization.

Applicability:

The policy is applicable to all stakeholders directly or indirectly associated with the Group, advisors, vendors, customers, etc.

Coverage:

1. Malpractice, impropriety and wrongdoing 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.
2. Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law (e.g. insult or defamation)
3. Breach of any Policy or Manual or Code of conduct adopted across SGLPL.
4. Health and safety risks, including risks to the public as well as other employees (e.g. faulty electrical equipment)
5. Fraud and corruption (e.g. to solicit or receive any gift/reward as a bribe)
6. Any instance of failure to comply with legal or statutory obligation either for and on behalf of the Group or in any personal capacity in the course of discharging duties of the Group.
7. Any instance of any sort of financial malpractice Abuse of authority/power (e.g. bullying/harassment)
8. Any other unethical or improper conduct.
9. Any undue favor or restraint based on caste, religion/region and gender.

Exclusion:

This Policy will not cover issues relating to employment related grievances Product Quality, PMS, promotions **and transfers etc. which will be separately dealt under Employee Grievance Handling.**

Ombudsman Committee:

The policy has Ombudsman Committee and will have 6 committee members.



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Group Ombudsperson:

The Group Ombudsperson will be nominated annually by committee members.

Anonymous Disclosure:

This Policy encourages the whistle blowers to mention their names while making the disclosure. Concerns expressed anonymously / pseudonymously will not be normally entertained. However, where an anonymous disclosure contains references to verifiable facts and figures, such cases will be taken up for investigation.

Frivolous, Fictitious and Malafide disclosure:

If a whistle blower makes an allegation which disclosure knows to be untrue or with an intent to defame and is confirmed by subsequent investigation, appropriate action will be taken against such whistle blowers. In case of a habitual complainant found to be making false / frivolous complaints, an appropriate disciplinary action will be initiated against the complainant. Further, the subsequent complaints / disclosures made by him/her may not be considered.

Disclosure:

The external stakeholders like Vendors, Suppliers, Service providers, Customers Financiers, Shareholders etc., can make a disclosure through the following communication modes:

Mode of disclosure	Reachable at
WhatsApp	+91-9319573200
Email	ethicscounselor@siddhathpetro.com

Assurance under the policy (to the Whistle blower):

1. All possible precautions will be taken to maintain the confidentiality of the identity of the Whistle Blower, barring where such disclosure is required strictly for the purpose of law or to facilitate the investigation process.
2. The Group will not tolerate any harassment or victimization (including informal pressures) against the whistle blowers and will take appropriate action to protect the whistle blowers when he/she makes the disclosure in good faith.



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3. The Group will provide adequate and timely support and protection to the whistle blowers in the event of facing any civil or criminal action in consequence to the disclosure made to the Group.
4. If a whistle blower believes that she/he has been victimized for raising a disclosure under this policy, he/she may file a written complaint to the MD requesting an appropriate remedy.
5. The investigation shall be carried out in a neutral fact-finding manner by an appropriate internal or external agency on the case to case basis.

Assurance under the policy (on whom the investigation is carried out, hereinafter referred as "Subject"):

All possible precautions will be taken to maintain the confidentiality of the Subject except for a disclosure or identify requirement strictly for the purpose of law or to facilitate investigation process.

Policy administration guidelines:

1. Personal meetings required, if any, with the whistle blower will be conducted, if found necessary.
2. The outcome of the investigation will be informed to the whistle blower and he will be thanked / suitably and may be rewarded in deserving cases for raising the disclosure.
3. Appropriate reporting on a regular / periodical basis will be made to the MD by the Group Ombudsperson.

Procedure:

- Whistle blower to provide the information / details with facts and figures basis the coverage under the policy to Ombudsperson either through phone, or by e-mail.
- Receipt of disclosure from any stakeholder(s) by Ombudsperson.
- Acknowledge/understanding of disclosure by Ombudsperson.
- In case the disclosure is found fictitious no further investigation will be done.
- On the acceptance of the disclosure the ombudsperson will do the investigation within 30 days.
- In case required ombudsperson may take help of the external investigation agency.
- Ombudsperson shall share the investigation report with Ethics Committee within 7 days of completion of report.
- Ethics Committee in consultation with MD and HR will take a decision on the same will be communicated to both the parties – whistle blower and subject.
- Either party can appeal to the Ethics Committee/ MD within 30 days and based on review and analysis of facts final decision will be taken which will be binding on all.
- The Ombudsperson will make half yearly / yearly presentation to Supervisory Board and MD on the development, closure and summary of the policy implementation.