Whistle-Blower Policy

VYPAK PROPERTIES PRIVATE LIMITED

Group refers to the Century Group in this document.

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1) Preamble

The Company's values of Integrity, Commitment, Speed, Empathy, Seamlessness and Agility are the foundation for all our actions and for the decisions we take. They set standards for the organization's and for employees' conduct.

2) Purpose

The purpose of this policy is to articulate the Company's point of view on whistle-blowing and to establish processes and procedures to strengthen the whistle-blowing mechanism at the Company. This policy:

- Provides platforms and mechanisms for the Employees and Directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- Provides an environment that promotes responsible behaviour and protects whistle-blowing.
- Reminds Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Company's Values or the Company's Code of Conduct.
- Above all, it provides for and protects a dynamic source of information about, what may be going wrong at various levels within the Company, which will help the Company in realigning various processes and to take corrective actions as part of good governance practice.

3) Coverage

This policy is applicable to all employees and Directors in or outside the offices in India (including corporate, sales, region and site office). This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.

4) Whistle-blower Definition

Any Employee, Director or third party who discloses or demonstrates evidence of an unethical activity or any conduct that may constitute breach of the company's Code of Conduct or Values is considered a whistle-blower. This whistle-blower may have come to the decision to make a disclosure,or express a genuine concern/grievance/allegation, after a lot of thought.

5) Protection

The process is designed to offer protection to the whistle-blower (employees and directors) provided that the disclosure made/concern raised/allegations made ("complaint") by a whistle-blower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Company's Values and/or the Company's Code of Conduct.

The Company affirms that it will not allow any whistle-blower to be victimized for making any complaint. Any kind of victimization of the whistle-blower brought to the notice of the Value Standards Committee will be treated as an act warranting disciplinary action. The Value Standards Committee of Birla Estates Private Limited, the Holding Company shall act as the Value Standards Committee of the Company.

As a Company, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against whistle-blowers. Complete protection will be given to whistleblowers against any unfair practices like retaliation, threat or intimidation, 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 in a free and fair manner.

6) Reporting a Complaint

Every whistle-blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to submit a complaint, does so after gathering adequate facts/data to substantiate the complaint and not complain merely based on hearsay or rumour. This also means that while no action will be taken against the whistle-blower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the Value Standards Committee shall take appropriate disciplinary or legal action against the concerned whistle-blower.

List of Exclusions

The following types of complaints will ordinarily not be considered and taken up:

- Complaints that are illegible, if handwritten.
- Complaints that are trivial or frivolous in nature.
- Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judicial or quasi-judicial body.
- Any matter that is very old, based on the date on which the act constituting violation, is alleged to have been committed.
- Issue raised, relates to service matters or personal grievance or also any customer/ product/ related grievance.

7) Dealing with anonymity

A whistle-blower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

8) Confidentiality

The Value Standards Committee will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistle-blower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistle-blower.

9) Whistle-blower Officer Definition

For the purpose of this policy, the whistle-blower officer will be Company Secretary at a Business level (or in his/her absence, the Legal Head) and Regional Finance Lead/ Head/ Manager (or in his/her absence, the Regional Legal Lead/ Head/Manager) of the relevant region would act as the Whistle-blower Officer.

10) Procedure for raising a Complaint

A whistle-blower can make a complaint in multiple ways:

- Writing to the Business Value Standards Committee on bepl.vsc@adityabirla.com. The information about Value Standards Committee (VSC) members and their e-mail ids will also be shared with all the employees and directors of the Company and will also be suitably displayed at a prominent place at all offices in India

- Sending a complaint to the ethics hotline by calling on a toll-free number **1800 102 6969,** or e- mail to centurygroup@integritymatters.in or write to Century Group, C/o Integrity Matters, Unit 1211, CENTRUM, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West – 400604, Maharashtra,India. This is operated by an independent third party vendor.
- Writing to the Corporate Human Resources or Chief Executive Officer or Company Secretary or Secretary of Value Standards Committee, as these officials are duty bound to share the complaint with the Value Standards Committee.
- Investigation shall be completed within 90 days of the receipt of complaint and is extendable by such period as the VSC deems necessary.

11) Periodic Reporting

A quarterly report will be placed before the Value Standards Committee and also shared with the Corporate Human Resource at Century Group Level.

12) Guidelines for communication and implementation of this policy

An ethics hotline will be made available. This toll-free number will be available for reporting of any violation or misconduct. A communication mechanism will be put in place to create awareness about this policy with the existing employees and for new joinees in all regions/projects operating in India.

It is the responsibility of the Human Resource Department to ensure that the updated names and email id of the various Business and Region Level Value Standards Committee is made available to all employees through the local intranet and/or any other communication mechanism they may adopt.

This policy is equally applicable to Third parties who may wish to report a concern related to a potential violation of the Group Values or the Company Code of Conduct.

For any query or clarification on this policy, you may write to the Company Secretary at be-vypak@adityabirla.com or Head - HR of Holding Company at nisha.dubey@adityabirla.com.

Annexure 'A'- Template for Reporting Violations

To: Value Standards Committee_____Level

Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Please note that multiple issues can be selected:

1. Misappropriation of company assets or resources ☐
2. Conflict of interest ☐
3. Inappropriate sharing of confidential information ☐
4. Financial fraud of any nature ☐
5. Violation of gifts and entertainment guidelines ☐
6. Non-adherence to safety guidelines ☐
7. Inaccurate financial reporting ☐
8. Bribery & Corruption ☐
9. Insider trading including dealing with instances for leak of unpublished price sensitive information ☐
10. Other forms of Harassment – Victimization, Bullying, Discrimination etc. ☐
11. Social Media Usage ☐
12. Misuse of authority ☐
13. Environment, health and safety ☐

14. Concurrent employment ☐

Others _____

Please provide name, designation and department of the person(s) involved?

	Name	Department	Designation
Individual 1			
Individual 2			
Individual 3			
Individual 4			

- **When did the incident occur?** (Please provide tentative date if you do not know the exact date)

  _____

- **Please confirm the location of the incident**

  _____

- **How did you find out about this incident?**

  _____

- **How long has this been occurring for?**
  - ☐ Less than a month
  - ☐ 1-6 months
  - ☐ 6-12 months
  - ☐ Greater than 12 months

- **Please provide a detailed description of the incident. To enable the Company to act on your complaint, you are requested to provide specific information. Where possible, please include names, location, date, time etc. Please note that this field is limited to 5,000 characters.**

  _____

  _____

_____

_____

_____

_____

_____

 Do you have any evidence in support of your allegations?

- ☐ Yes
- ☐ No

- **Is anyone else aware of this incident?**
  - ☐ Yes
  - ☐ No

- **Is there any additional information that would facilitate the investigation of this matter?**
  - ☐ Yes
  - ☐ No

- **Have you reported this incident to anyone in the company?**
  - ☐ Yes
  - ☐ No

Date: _____

Location: _____

Name of the Person reporting (optional): _____

Contact Information (incl. email optional): _____

End of document