



A SUBSIDIARY OF TATA STEEL LTD.



Ref. No.: WP/ETHICS/871 /2015-16
Date: 26 Nov 2015

Rev 01

WHISTLE BLOWER POLICY FOR VENDORS

In compliance with Clause 25 of Tata Code of Conduct and in furtherance with ISWPL's ("Company") policy to encourage and protect genuine Whistleblowing by Vendors, a Vendors' Whistleblowing Protection Policy ("Policy") has been developed.

Definitions:

"Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith and which discloses information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature, by any Employee, Director or vendor

"Vendor Whistle Blower" means a person/organization registered in the Vendor data base of the Company, making a Protected Disclosure and thereafter extending whatever assistance may be required in establishing facts mentioned in the Protected Disclosure.

Procedure:

- Protected Disclosures should preferably be reported in writing i.e. in ink or electronically, and should be factual (not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower.
- Misconduct concerning the Ethics Counsellor and employees at the levels of General Managers and above, should be addressed to the Ethics Officer and those concerning other employees, should be addressed to the Ethics Counsellor of the Company.
- The Whistleblower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistle Blowers.
- The contact details of the Ethics Officer and of the Ethics Counsellor of the Company are as under:

Ethics Officer:

Mr. Neeraj Kant, DB-1, ISWP, Indranagar, Jamshedpur – 831 008.

Ethics Counsellor:

Mr. Jitendra Kumar Singh, Ethics Counsellor, ISWP. Jamshedpur 831 008.

E-mail: ethics@iswp.co.in, jitendrakumar.singh@tatasteel.com, jksingh@iswp.co.in

Protection to the Vendor Whistleblower:

- The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Vendor Whistleblowers while conducting business with the Company.
- The Vendor Whistleblower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/orders, refusal from issuance of 'RFQ (Request For Quotation)' to them, or any direct or indirect use of authority to obstruct the Vendor Whistleblower from continuing to execute their jobs, including making further Protected Disclosures.
- Should, in spite of best efforts by the Company, the identity of the Vendor Whistleblower become known during the investigation, the Head Procurement and the Head of the concerned user departments, shall ensure that the Vendor Whistleblower, is provided with all the assistance required to execute existing orders.
- Under no circumstances, subjects against whom the disclosures have been made should compel investigator to disclose the identity of the Vendor Whistleblower.



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Disqualifications:

Any abuse of this protection by vendors will warrant disciplinary action.

Whistle Blower Protection Committee:

The Company has constituted the Whistle Blower Protection Committee ("the Committee"). In case a Vendor Whistleblower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the Ethics Counsellor, giving specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Committee for their examination. The Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

Amendment:

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Notification to this Policy:

Sr. GM- Procurement shall ensure that an approved copy of this Policy and its subsequent amendments if any, are notified in writing/ via email, to all the vendors engaged by the Company.

A handwritten signature in black ink that reads 'Neeraj Kant'.

Neeraj Kant
Managing Director