

WHISTLE BLOWER POLICY

Complaint and Investigation Procedures for Accounting, Internal Accounting Controls, Fraud, Auditing Matters or others:

All directors, officers and employees of the Company are responsible to report in good faith, questionable accounting/auditing matters, internal accounting controls, financial reporting (Accounting Complaints), any violations, fraudulent/unethical practices, misconduct or such other genuine concerns, which are against the interests of the Company. It is the policy of the Company to treat such complaints seriously and expeditiously.

The reporting, which will be free of retaliation and discrimination, shall be in writing either by way of email or letter. While the policy encourages directors, officers to disclose their names, the reporting may also be made anonymously.

The reporting for other than accounting complaints may be made to the Head of the Department who in turn shall report to the Chairman & Managing Director through the Compliance Officer for corrective action. However, if employee is unwilling or unable to report or complain through the Head of the Department for any specific reason, he may directly report or complain to the Chairman & Managing Director with a copy to the Compliance Officer, by disclosing the reason for doing so. In case of key management personnel (all the levels at and above Director, CFO and the Compliance Officer), the reporting may be directly made to the Chairman of the Audit Committee. As regards accounting complaints, the reporting shall be made to the Chief Financial Officer, who shall directly report to the Audit Committee for review and investigation under its direction.

Policy against Retaliation

The Company strictly prohibits retaliation against any Director and Key Management Personnel or employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee because the employee, in good faith, sought help or filed a report

will be subject to disciplinary action, including potential termination of employment.