

WHISTLE BLOWER POLICY

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1. Purpose of this policy

This policy:

- 1.1. Provides a platform and mechanism for the Employees, Directors and other Stakeholders to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- 1.2. It provides an environment that promotes responsible and protected whistle blowing. It facilitates Employees, Directors and other Stakeholders about their duty to report any suspected violation of any law that applies to the Group and Suguna Group's Code of Conduct.
- 1.3. Above all, it is an open platform of sharing/ reporting any immoral/unlawful activities at various levels within the Group and which will help in realigning diverse processes and take corrective measures as part of good governance.

2. Applicability of this policy

- 2.1. This policy is applicable to all the Group Companies, including all Employees, Directors and other Stakeholders. Suguna Group constitutes the following companies:
 - 2.1.1. Suguna Holdings Private Limited (SHPL)
 - 2.1.2. Suguna Foods Private Limited
 - 2.1.3. Suguna Dairy Products (India) Private Limited
 - 2.1.4. Globion India Private Limited
 - 2.1.5. Suguna Foods Bangladesh Private Limited
 - 2.1.6. Suguna Foods Kenya Limited
 - 2.1.7. Aminovit Private Limited, Sri Lanka

3. Definitions

- 3.1. **“Code”** means the Suguna Group's Code of Conduct.
- 3.2. **“CHRO”** means the Chief Human Resource Officer of Suguna Group.

- 3.3. **“Employee”** – Any Individual who is directly engaged and is assigned with specific responsibilities for achieving desired outcome which are in line with business expectations is termed as an “Employee”.
- 3.4. **“Board”** means Board of Directors of the Companies under Suguna Group.
- 3.5. **“Stakeholder”** denotes the Farmers, customers, suppliers, Traders, vendors, service providers, consultants etc. who are directly or indirectly dealing with Suguna Group.
- 3.6. **“Whistle Blower”** means any Employee, Director and other Stakeholders either as individual or Group who discloses any evidence of an unethical activity with substantial evidence or any conduct that may constitute breach of the Group’s/Group Company’s Code of Conduct or Group Values. This whistleblower has come forward willingly to express genuine concern/ grievance/ allegations, after thoughtful consideration in the interest of highlighting and resolving specific issues.
- 3.7. **“Whistle Blower Officer”** means for the purpose of this policy, the CHRO of the Group would act as Ombudsman/Whistle Blower Officer to address the issue in consultation with the concerned leadership team in an unbiased manner with no prejudice.

4. Scope:

- 4.1. Malpractices which have taken place/ suspected to have taken place.
- 4.2. Misuse or abuse of authority.
- 4.3. Fraud or suspected fraud.
- 4.4. Violation of Suguna Group Company rules.
- 4.5. Manipulations/negligence causing danger to public health and safety.
- 4.6. Misappropriation of funds and other matters or activity on account of which interest of the company is affected.
- 4.7. The Whistleblower’s role is that of a reporting party with reliable information, where they are not required OR expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.

Whistle Blower's reporting procedure:

5. What should be reported under the WB Policy?

5.1. Under the WB Policy, every employee within the Group and other stakeholders are expected to promptly report any actual or possible violation of:

5.1.1. The SUGUNA Group's Code of Conduct

5.1.2. Any unlawful, unethical or improper activity concerning any of the SUGUNA Businesses.

5.2. Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or word of mouth or in frustration. This also means that no action would be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

6. Ways to report:

6.1. Whistle Blower can send a written report (to the below mentioned address) or an email to whistleblower@globionindia.com.

6.2. Online complaint may also be submitted through the link provided in website www.suguna.group

6.3. The Complaint may also be sent through registered post to the following address:

“To
The Group CHRO
Suguna Group
UNITEA Building, II Floor, Above Big Bazaar,
No.3, Savithri Shanmugam Road,
Race Course, Coimbatore – 641018.”

7. “Whistle Blower” Protection:

7.1. The Group affirms that it will not allow any whistleblower to be victimized for making any complaint. If any kind of victimization of the whistleblower

is brought to the notice of the management, appropriate disciplinary action will be taken post due investigation.

- 7.2. If a Whistle Blower wanted to report anonymously it can be done so. The identity of the whistle blower will not be revealed. However, if Whistle Blower chooses to report something anonymously, then he/she should provide sufficient evidence to justify the complaint for commencement of an investigation.
- 7.3. As a Group, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against the whistleblowers. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion or any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

8. List of exclusions:

- 8.1. The following types of complaints will not be considered for follow up actions:
 - 8.1.1. Complaints those are illegible, if handwritten;
 - 8.1.2. Complaints those are vague, with pseudonyms;
 - 8.1.3. Complaints those are trivial or frivolous in nature.
 - 8.1.4. Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body;
 - 8.1.5. Any matter that is more than 12 months old from the date on which the act constituting violation is alleged to have been committed;
 - 8.1.6. Issue raised, relates to service matters or personal grievance.
- 8.2. The Whistle Blowers are encouraged to make complaints that have an impact on Group's Brand & reputation, cases of financial irregularities, or People related issues like abuse, victimization or harassment.

9. Confidentiality:

- 9.1. The Ombudsman will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important , it may be disclosed, on a

‘need-to-know-basis’, during the investigation process and only with the prior approval of the whistleblower.

10. Procedure for handling a complaint is given as below:

- 10.1. Upon receipt of complaint, the Ombudsman will first do a preliminary investigation to check whether the complaint seems to be genuine and falls under the purview of whistle blower policy.
- 10.2. If complaint does not fall under purview of whistle blower policy, then same would be redirected to the right forum for necessary action by the Ombudsman.
- 10.3. Once established that the case needs investigation, the Ombudsman shall form an exclusive team to investigate the case, with utmost confidentiality. The investigative team will be a pool of internal people specially trained to investigate or can be an external agency specialized to investigate such cases.
- 10.4. Under no circumstances, the Ombudsman and/or investigation team would reveal/ disclose the identity of the “accused” to anyone else (including the immediate manager).
- 10.5. The investigation team should work towards ensuring that the investigation is completed by following the laws of the land and principles of natural justice within 3 weeks of the complaint being reported. If the investigation cannot be completed within 3 weeks, then the investigation team needs to have very valid and strong reasons for the same.
- 10.6. Once the investigation is complete, the same will be submitted to Ombudsman with the investigation report for perusal and the same will be presented by the Ombudsman to the Board of Directors of respective entity based on the following:
 - Severity of the misconduct
 - Impact on the Organization (Reputation, Financial / Non – Financial)
 - Past record of the employee
 - Past precedence of treating similar violations (a summary of the same will be kept with Organization Effectiveness portfolio at Group Human Resources)

- 10.7. The punishment shall constitute a minimum of written warning and/or may lead to withdrawal of increment/ demotion, withholding promotion, dismissal from service and/ or even prosecution in the court of law.
- 10.8. While implementing the recommendation, the management will ensure that the name of the whistle blower and the person accused is kept confidential at all times.
- 10.9. In case the whistle blower or the person accused is not satisfied with the decision, he/she has the option to appeal within 7 days of the order, to the Ombudsman.
- 10.10. Based on the appeal and considering the Severity of the case, Ombudsman, will decide whether to re-investigate / relook at the quantum of punishment, post which the same will be presented to Board of Directors for further action within 21 days of receiving the appeal.
- 10.11. If the charges framed on the accused is found to be false after investigation, it is essential to demonstrate that the employee's dignity is respected. Hence, the Ombudsman should thank the employee personally for having cooperated in the process. A formal closure letter has to be sent informing that the charges have not been proved during the investigation process and hence he / she is fully exonerated of all the charges.

11. Communication

- 11.1. A communication mechanism shall in place to create awareness about this policy with the existing employees and for new joiners' in all Group Companies.
- 11.2. A copy of this policy will be placed on the website.

12. Validity & Amendments

- 12.1. This policy shall be valid from 1st February, 2022 to 31st January, 2024 and subsequent reviews/ amendments shall be made on a yearly basis.