

## **Whistle-blower Policy**

### **Overview, Objective and coverage of the Policy:**

Origo has introduced and enforced this Whistle-blower Policy as it is committed to bring in highest possible standards of honesty, integrity, transparency, professionalism, and accountability in all its working and affairs. The Company has its set code of conduct and other laid down ethical practices that govern the actions of the employees and in turn the Organization. The Company is also morally responsible for protecting the interest of its clients and other business stakeholders, towards the conduct of business and its related affairs.

Accordingly to promote and implement highest ethical standards of organizational functioning, we need an organization based social infrastructure that facilitates protected disclosures and correct reporting of any actual happening or possible violation of its code of conduct, fraud and cheating, misrepresentation and leak / sharing of company data or confidentiality clause, malpractices or impropriety, or any such legal or regulatory deviation or any such similar things, that is not mentioned herewith. It thus intends to cover all such serious concerns that could have an impact on the Operations and functioning of the Company.

### **Scope of the Policy:**

This Policy empowers every stakeholder of the company to disclose and fearlessly report regarding any above-noted violations. Stakeholders include employees of the company, persons hired by the company for its services, its Clients / Customers, Vendors and Contractors / Suppliers, etc.

However, this policy does not intend to exempt any person from the duty of confidentiality nor it is any route to vent out personal enmity or grudges or taking up a grievance about a personal situation.

### **Procedure to raise serious concerns / matters or reporting mechanism:**

1. Employees or any such business stakeholder, as mentioned above, may directly raise such issues by writing an email to [whistleblower@origoindia.com](mailto:whistleblower@origoindia.com).
2. Matter can be reported to our Director(s) or CEO or HR department, to a representative designated as Asst. Manager or above, in confidence. It can also be reported directly to the department head of our Audit and Vigilance department.
3. We encourage stakeholders to share their full identity and basic details of the incident such as to which department and place the incident belongs to, time when it happened, possible fallout, who to contact for more information, etc. with names and designations of the persons involved or suspected to be involved and description of the documents that relate to the violation, etc.
4. Concerns may be raised anonymously. However informers must put forth facts and proofs in detailed manner.

**Investigation:**

- Each complaint shall be investigated thoroughly, properly and promptly till its logical conclusion and final action, through the formation of an independent investigation team or through a properly constituted committee, if the nature of the complaint so warrants. Another person(s) / committee may be appointed by Director(s) /CEO of the company as may be needed from time to time.
- Generally the information as mentioned in the complaint shall have to be kept confidential, except the amount of the information that is to be shared / disclosed in the conduct of the investigation and in the conclusive action.
- Every employee and other stakeholders are encouraged to cooperate in the investigation with his or her actions and support the investigation and in drawing the logical conclusion.
- Suitable action shall be taken upon the conclusion of the investigation.

**Protection to the complainant or the whistle-blower:**

1. The identity of the whistleblower shall be kept confidential except wherever required to be disclosed as requirement of the law.
2. Through this policy, we make sure that employee(s) or other business stakeholders who come forward to register complaints, or help or participate or coordinate in investigation, should not get any unfair treatment, or are subjected to any of retaliation or adverse consequences related to employment, promotion or increment opportunities, etc.
3. Any such concern on the part of the employee shall be addressed on top.
4. However, complainant should ensure there is no abuse of the policy.

**General rules and points of caution:**

- As described above, the complainant or the whistle blower should not take this policy as a means to settle personal score or personal grievance. One should make sure that the material facts related to complaints are correct.
- The investigation so carried out as a result of the complaint, should be correct and fair and free from any of the personal bias.
- All confidentiality should be maintained in relation to the complaint and procedure and result of the investigation thereon.

- Except management, only specified or related persons / employees shall have access to documents related to complaints or investigation reports.

Management has the right to change / amend the contents or the terms and conditions or provisions related to whistleblower policy, with or without notice. The decision of the Management shall be final and binding.

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