POLYCAB

POLYCAB INDIA LIMITED (PIL)

WHISTLE COMMITTEE

Composition:

Sr. No.	Designation	Category
1.	Compliance Officer	Whistle Officer
2.	Any three of the following Senior Managerial Personnel*:	
	a) Chief Financial Officer	Member
	b) Chief Human Resources Officer	Member
	c) Director (Non-Board member)	Member
	d) CEO (Business Unit Head)	Member
	e) Executive President	Member

*as may be approved by the Finance and Operations Committee from time to time.

Terms of Reference:

The Whistle Officer and the Whistle Committee shall have following accountabilities:

(i) Conduct the investigation in a fair, unbiased manner
(ii) Ensure complete fact-finding
(iii) Maintain strict confidentiality
(iv) Decide on the outcome of the investigation
(v) Decide / propose an appropriate course of action including the disciplinary action
(vi) Maintain confidentiality of the subject matter of the Disclosure and the identity of the persons involved in the alleged malpractice/violation

Whistle Officer and the Whistle Committee shall follow the below procedure after reporting Protected Disclosure:

a) The Whistle Officer shall scrutinise the complaint if any, received from the Whistle Blower to the Whistle Committee
b) The Whistle Committee shall acknowledge receipt of the Protected Disclosure as soon as practical (preferably within 7 days of receipt of a Protected Disclosure), where the Whistle Blower has provided his/her contact details.
c) The Whistle Committee shall proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the Protected Disclosure. If the Whistle Committee determines that the allegations do not constitute a malpractice/violation, Whistle Officer shall record their finding with reasons and communicate the outcome to the Whistle Committee.
d) The decision to conduct an investigation taken by the Whistle Committee is by itself not an accusation and is to be treated as a neutral fact-finding process.
e) Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation. subjects have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the Subjects.
f) The Company shall take steps to protect the Whistle Blower from victimisation and minimise any difficulties which a person reporting under Whistle Blower may experience as a result of raising a concern.
g) The Company accepts and would take such steps as may be required to assure the Whistle Blower that the matter has been appropriately addressed.

Frequency of Meeting:

Any two members of the senior management personnel together with Compliance Officer shall constitute the quorum for the Committee.

Frequency of Meeting:

The Whistle Committee shall meet on occurrence of event.