

WHISTLE BLOWING POLICY

Policy statement:

IRCLASS Systems and Solutions Pvt Ltd (ISSPL) is committed in conducting its business with honesty and integrity, and all employees are expected to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

What is Whistle blowing?

“Whistleblowing” is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

Activities in conflict with or in violation of the

- ISSPL - Code of Ethics
- Criminal activity
- Bribery
- Financial fraud
- Conduct likely to damage our reputation

A “whistle-blower” is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of ISSPL’s activities (a “whistle blowing concern”) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should report to your respective Head of Department/Divisional Head.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistle Blowing Committee, comprises of Company Secretary, Divisional Head and Head HR.

Raising a Whistle blowing concern

Any concern falling under the category of whistle blowing must be reported directly to the Head - HRD of IRCLASS (suman.jha@irclass.org). In exceptional circumstances the matter may be reported directly to the Director of the organisation, at vinay.k@irclass.org.

Confidentiality

It is hoped that employees of ISSPL will be able to voice Whistle blowing concerns openly under this policy. However, if you want to raise your concern confidentially, every effort will be made to keep your identity secret. If it is necessary for anyone investigating your concern

to know your identity, this will be discussed with you. The Whistle Blowing Committee would ensure that any person raising a concern under this policy would not be subject to victimization in any manner.