

HINDUSTAN WIRES LIMITED

WHISTLE BLOWER POLICY

1. Objective

This policy is formulated to provide mechanism to employees and Directors to approach the Audit Committee of the Company and disclose unethical improper practices or any other alleged wrongful conduct in the Company and to prohibit managerial personnel from taking any adverse personal action against those persons.

2. Applicability

This Policy applies to all permanent employees & Directors of the Company.

3. Scope of Policy

The policy intends to cover following information to suspected unethical and improper practices or wrongful conduct, which employee(s) and directors in good faith believes to exist:

- a. Manipulation of Company data/record
- b. A substantial and specific danger to public health safety.
- c. An abuse of authority.
- d. Leaking confidential or proprietary information.
- e. Violation of any law or regulations.
- f. Gross wastage or misappropriation of Company funds/assets.
- g. Activities violating policies of the Company including Code of Conduct.

The above list is only illustrative and should not be considered as exhaustive.

4. Procedures

- a. The Chairman of Audit Committee will constitute a two member committee (whistle blower committee) which shall be entrusted with various functions under this policy including receipt of disclosures and investigation of matters.
- b. Any employee and director who observes any unethical and improper practices or alleged wrongful conduct shall make a disclosure to Whistle Blower Committee in writing as soon as possible but not later than 60 consecutive calendar days after becoming aware of the same and furnish as much details and evidence as possible.
- c. The Whistle Blower Committee shall appropriately and expeditiously investigate all whistle blower reports received.



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- d. The Whistle Blower Committee shall have to right to call any information/Document and examination of any employee and director of the Company or other persons (s) as they may deem appropriate for the purpose of conducting investigation under this policy.
- e. After completion of investigation, a report shall be prepared by Whistle Blower Committee and be placed before the Audit Committee for its consideration.
- f. After considering the report, the Audit Committee shall determine the cause of the action and may order for remedies which may inter aila include.
 - i) Revision of the policies and procedures of the Company to reduce the risk of recurrence.
 - ii) Suggest action against concerned persons.

5. Protection

- a. No discrimination, harassment, victimization or any other unfair employment practice like relations , threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or like will be adopted against Whistle Blowers.
- b. A Whistle Blower may report any violation of the above clause to the Chairman of the Audit Committee, who shall investigate into the same and recommend suitable action to the management which may inter alia include.
 - I. Reinstatement of the employee and director to the position or to an equivalent position.
 - II. Order for compensation for lost remuneration of any other benefits.

6. Anonymous Allegations

This policy requires individuals to put their name to any disclosures they make.

7. Confidentiality

The Company will treat such disclosures in a sensitive manner and will Endeavour to keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which can not be kept confidential if legal proceedings arise.

8. Untrue/Malicious/Vexations Allegations.

If an individual makes an allegation, which is not confirmed by subsequent events, and the investigation shows that an individual has made malicious or vexations allegations for personal leverage, and particularly he or she persists with making them, disciplinary action may be taken against the individual concerned.



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9. Notification

Factory Manager is required to notify and communicate the existence and contents of this policy to the employees of the Company. The new employees shall be informed about the policy by the Factory Manager and Director shall be informed about the policy by the secretarial Deptt. This policy as amended from time to time shall be made available on the website of the Company.

10. The contact details of the committee of Whistle Blower and the Chairman of the Audit Committee are as follows :-

a.	The Chairman, Whistle Blower Committee Hindustan Wires Limited Plot No. 267, Sec – 24 Faridabad - 121005	ho@hwlgas.com
b.	The Chairman, Audit Committee, Hindustan Wires Limited Plot No. 267, Sec – 24 Faridabad - 121005	ho@hwlgas.com

For Hindustan Wires Ltd.


(R. K. Gupta)
Executive Director