

Shivalik Solid Waste Management Limited



WHISTLE-BLOWER POLICY

I. INTRODUCTION

The policy is applicable to BEIL and its group companies (hereinafter referred to as Group or BEIL Group). BEIL Group consists of BEIL Infrastructure Limited, Enviro Technology Limited, BEIL Research and Consultancy Private Limited, Kerala Enviro Infrastructure Limited, Shivalik Solid Waste Management Limited, Coimbatore Integrated Waste Management Company Private Limited, Gharpure Engineering and Constructions Private Limited, Gharpure Engineering Vasai Virar STP Private Limited and Tatva Global Water Technologies Private Limited.

Consistent with its principle of providing a workplace conducive to open discussions of business practices, BEIL Group is fully committed to complying with all applicable laws that protect employees against unlawful discrimination or retaliation as a result of their disclosure or reporting of questionable or illegal acts by BEIL Group. Accordingly, BEIL Group has established a set of procedures for anyone to submit (whether openly, confidentially, or anonymously) concerns about any misconduct for the designated personnel to receive and respond to such concerns. This written policy describes such procedures.

This written policy also describes the procedures to receive and act on any such concerns that are raised by Company Employees or other interested parties.

II. SCOPE OF THE POLICY

This policy is designed to facilitate anyone (including but not restricted to employees, business partners, competitors, customers and members of the public) to disclose any improper conduct (misconduct as defined in Section 2 in the Code of Conduct) through a whistle-blowing form [Refer [Appendix 1]. The same can also be accessed on intra-net and website] or any other means of written communication such as email, letters, etc.

Reportable misconduct includes:

- i. Contravention of the Code of Conduct
- ii. Fraud;
- iii. Bribery;
- iv. Collusive Practice;
- v. Coercion;

Shivalik Solid Waste Management Limited



- vi. Abuse of Power;
- vii. Conflict of Interest;
- viii. Theft or embezzlement;
- ix. Misuse of Company's Property;
- x. Sexual Harassment
- xi. Non Compliance with defined policies and procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under Code of Conduct (CoC) or any criminal offence under relevant legislations in force.

III. PROCEDURES FOR MAKING COMPLAINTS

- A.** The Complainant may use the whistleblowing form [Refer Appendix 1. The form can also be accessed on the intranet and website] or use any other means of communication such as email, letter containing adequate information to report openly, confidentially, or anonymously any misconduct to Compliance Officer and CEO.
- B.** If you have concerns about reaching out to any of the above, your report may be made in writing to the email id whistleblower@beil.co.in
- C.** In making a Report, complainant should exercise due care to ensure the accuracy of the information disclosed and should provide sufficient information to enable an investigation to be conducted. In case the information is not sufficient or vague, no further investigation will be carried out.

IV. PROCEDURES FOR HANDLING REPORTS OR CONCERNS

- A.** Any Report that is made directly to a CEO (whether openly, confidentially, or anonymously) shall be promptly reported to the Compliance Officer.
- B.** Each Report forwarded to the Compliance Officer shall be reviewed by the Compliance Officer in consultation with the CEO. The Compliance Officer may, in its discretion, consult with any member of management who is not the subject of the allegation and who may have appropriate expertise to assist the Compliance

Shivalik Solid Waste Management Limited



Officer. The Compliance Officer shall in consultation with the CEO decide whether the complaint should be investigated, taking into account the considerations set forth in Section V below.

1. If the Compliance Officer decides that CEO should investigate the Report, the same shall be notified to the CEO of that decision. CEO shall thereafter promptly investigate the Report and shall report the results of its investigation to the Compliance Officer. Unless the Compliance Officer directs otherwise, CEO shall be free in its discretion to engage outside auditors, counsel, or other experts to assist in the investigation and in the analysis of the results thereof.
 2. If the Compliance Officer decides that he should investigate the Report, he shall promptly determine what professional assistance, if any, it needs in order to conduct the investigation. The Compliance Officer shall be free in its discretion to engage outside auditors, counsel, or other experts to assist in the investigation and in the analysis of the results thereof.
- C. Compliance Officer shall furnish a summary of Reports received and/or investigated to the Audit Committee.

V. **CONSIDERATIONS RELATIVE TO WHETHER THE COMMITTEE OR MANAGEMENT SHOULD INVESTIGATE A REPORT**

In determining whether management or the Committee should investigate a Report, the Compliance Officer shall consider, among any other factors that are appropriate under the circumstances, the following:

- A. **Who is the alleged wrongdoer?** If an executive officer, senior financial officer, or other high management official of the Company is alleged to have engaged in wrongdoing that factor alone may be sufficient for Compliance Officer to conduct the investigation.
- B. **How serious is the alleged wrongdoing?** The more serious the alleged wrongdoing, the more appropriate the Compliance Officer should undertake the investigation. If the alleged wrongdoing would constitute a crime involving the integrity of the financial

Shivalik Solid Waste Management Limited



statements of the Company or not adhering to the policies and procedures of the Company, that factor alone may be sufficient for Compliance Officer to conduct the investigation.

- C. ***How credible is the allegation of wrongdoing?*** The more credible the allegation, the more appropriate that the Compliance Officer should undertake the investigation. In assessing credibility, the Compliance Officer should consider all facts surrounding the allegation, including, but not restricted to, whether similar allegations have been made in the press or by analysts.

VI. PROTECTION OF WHISTLEBLOWERS

- A. Consistent with Company's policies, neither the Compliance Officer nor the members of management shall discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate, or tolerate any discrimination or retaliation by any other person or group, directly or indirectly, against any employee of Company who, in good faith, raises a concern, reports a retaliatory act, or otherwise assists the Compliance Officer, management, or any other person or group (including any governmental, regulatory, or law enforcement body) in investigating a Report. Any such act of retaliation or discrimination shall be treated as a serious violation of Company policy and could result in termination of employment with or dismissal as Director of the Company.
- B. Individuals in possession or/and knowledge of the complaint, shall not:
1. disclose the identity of any employee of the company who (a) raises a concern or reports a retaliatory act and (b) asks that his or her identity as the person who made such Report remain confidential, unless such disclosure is required by judicial or other legal processes; or
 2. Make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of any person who makes a Report anonymously.

Shivalik Solid Waste Management Limited



- C. If a person makes a Report in good faith and any facts alleged are not confirmed by subsequent investigation, no action will be taken against the reporting person.

VII. GENERAL

1. The Compliance Officer shall retain, for a period of three years or such further time as may be required for purposes of completion of investigation including complaints in courts, all records relating to (a) any concern or report of a retaliatory act and (b) the investigation of any such Report.
2. The Compliance Officer shall annually review the existence and functioning of the mechanism and ensure that the mechanism is appropriately communicated within the organization.
3. Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.
4. In the event of any doubts or questions concerning this policy, please seek advice from CEO or HOD or HR Head or Compliance Officer.

Shivalik Solid Waste Management Limited



Appendix 1:

Whistleblowing Form [fields are optional]	
1. Contact Information	
Name	
Staff ID	
Phone Number	
Address	
City, State	
PIN Code	
Department	
Designation	
2 Disclosure of allegation	
Names of person (s) involved	
Nature of allegation	
Location, Date and Time	
Brief summary of allegation	
3 Witness (or) supporting documentation, (use additional sheet if necessary)	
4 Declaration	
I hereby declare that all information given herein are made voluntarily and are true to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do understand that BEIL Group will use this information and material provided throughout the process for any disciplinary or legal action as per the code of conduct	
Signature _____	
Date _____	
* Additional evidence shall be submitted in flash drive, photos, audio recording, video, etc., and label reference shall be provided in the declaration for identification and corroboration of evidence.	

DATE: 07.08.2021

PLACE: Nalagarh

Sd/-
Ashok Kumar Sharma
C.E.O

Sd/-
Ashok Panjwani
Director