



## WHISTLE BLOWING POLICY

### APPLICABILITY

This is a Greatship Group policy and is applicable to all employees (and may include contract staff and consultants) of Greatship (India) Limited and all its subsidiaries.

### INTRODUCTION

The Greatship Group is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff / others to voice concerns in a responsible and effective manner.

Where any person discovers information which they believe shows serious malpractice or wrongdoing within the Group then this information should be disclosed to the appropriate authority without fear of reprisal.

### OBJECTIVE

The Whistle Blowing Policy aims to provide a vigil mechanism and an avenue for directors / employees to raise concerns and to disclose information which shows malpractice or impropriety. It also reassures such employees that there will be no disadvantage in raising legitimate concerns and they will be protected from reprisals or victimization for whistle blowing.

### SCOPE OF THE WHISTLE BLOWING POLICY

The Whistle Blowing Policy is intended to cover concerns which are in the Group's interest.

These concerns could include, but are not limited to, the following:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or statutes
- Dangers to health & safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these
- Pilfering of confidential information or company's property(ies)
- Wastage of company's funds / assets / misappropriation of funds

It should be emphasized that these guidelines are intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under other code of conduct or general employment policies.



## SAFEGUARDS

### 1. Confidentiality:

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

### 2. Anonymous Allegations:

The organization will encourage individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

### 3. Untrue Allegations:

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. However, while making a disclosure the individual should exercise due care to ensure accuracy of information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

### 4. Protection:

The company will offer protection to those employees who disclose such concerns provided the disclosure is made:

- In good faith
- In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if the disclosure is made to an appropriate person (mentioned in the procedure below)

## PROCEDURE FOR RAISING A CONCERN

The employee who wishes to raise a concern (henceforth referred to as whistle-blower), can approach Management (Executive Director / Managing Director) directly to report a concern, or forward a sealed envelope marked "Private and Confidential – Whistle Blower Policy" to the Company Secretary, who will forward the same to Management.

In case of exceptional circumstances, the employee may also directly approach the Chairman of the Audit Committee of the Board of Directors directly to report a concern, by forwarding a sealed envelope marked "Private and Confidential – Whistle Blowing Policy Greatship". The contact details of the Chairman of the Audit Committee are as follows:



# Code of Conduct & General Employment Policies

Policy Document

Version 1.1 Aug 2014

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## **Mr. Keki Mistry**

Housing Development Finance Corporation Ltd  
Ramon House, HT Parekh Marg,  
169, Backbay Reclamation,  
Churchgate, Mumbai - 400020

Email: [keki.mistry@hdfcindia.com](mailto:keki.mistry@hdfcindia.com)

## **PROCEDURE FOR HANDLING THE RAISED CONCERN**

### 1. Actions taken by Management:

Management may take immediate, effective steps to respond to any concern that has been reported and the concerned employee will be informed of the outcomes as may be necessary. In cases where a detailed investigation needs to be conducted, Management may form a Committee to carry out the investigation. If the concerns relate to Greatship's environment and safety or corporate financial fraud / irregularities, an external agency may be brought in to conduct the investigation.

### 2. Actions Arising from the Investigation:

Based on the report of the external agency / internal selected committee, Management will ensure that remedial action, wherever required, is taken in a timely manner. In certain cases, if required, Management will report the instance to the Audit Committee.



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### **ANNEXURE 1 TO THE WHISTLE BLOWING POLICY**

Pursuant to the reconstitution of the Audit Committee w.e.f September 20, 2020, the contact details of the Chairman of the Audit Committee as mentioned in the Whistle Blowing Policy are amended and replaced with the below mentioned details:

**Mr. Mathew Cyraic**

Florintree Advisors Private Limited

B1, 6th Floor Cnergy, Appasaheb Marathe Marg,

Prabhadevi, Mumbai 400025

E-mail: [mathew@florintree.com](mailto:mathew@florintree.com)

This Annexure-1 is effective from September 20, 2020 and shall form an integral part of the Whistle Blowing Policy.

For **Greatship (India) Limited**

**P R Naware**

**Executive Director**

Dated: September 20, 2020



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### **ANNEXURE 2 TO THE WHISTLE BLOWING POLICY**

Pursuant to the reconstitution of the Audit Committee w.e.f September 20, 2021, the contact details of the Chairman of the Audit Committee as mentioned in the Whistle Blowing Policy are amended and replaced with the below mentioned details:

**Mr. Shaleen Sharma**

15, Sugam Villa, Near Pleasure Club,  
Bhopal-Sanand Road,  
Ahmedabad -380 058

E-mail: [shaleensharma76@gmail.com](mailto:shaleensharma76@gmail.com)

This Annexure-1 is effective from September 20, 2021 and shall form an integral part of the Whistle Blowing Policy. All other terms of the policy, except to the extent amended as above, shall remain unchanged, valid and in full force and effect.

For Greatship (India) Limited

**P R Naware**  
**Executive Director**

Dated: September 20, 2021