

WHISTLEBLOWING POLICY

POLICY STATEMENT

POLYMER LINK INDIA PVT LTD (“Company”) and its subsidiaries (hereinafter referred to as “Polymer Link”) is committed to promote and maintaining high standards of transparency, accountability, ethics, and integrity at the workplace. An accountable and transparent workplace provides a mechanism for employees to voice genuine concerns in a responsible and appropriate manner.

OBJECTIVE

This Policy is formulated to help employees and third parties report possible improprieties at the earliest opportunity so that concerns can be raised without fear of reprisal or detrimental action.

SCOPE

This Policy applies to all employees and third parties who has become aware of or genuinely suspects on a reasonable belief that an employee of the Company has engaged, is engaged, or is preparing to engage in any Improper Conduct.

WHO IS A WHISTLEBLOWER?

Generally, a Whistleblower is an insider of an organization (e.g. employee, consultant, or vendor) who makes a complaint of improper conduct(s) that has occurred within that same organization.

In line with the Whistleblower Protection Act 2011, the whistleblowing channel serves as a confidential trusted reporting channel and encourages all employees and associates to make disclosures of such alleged improper conduct (whistleblowing) to the relevant authorities in good faith.

Only genuine concerns of any suspected and/or real misconduct should be reported via the whistleblowing channel. The complaint should be made in good faith with a reasonable belief that the information relating to the same is substantially true, and not for personal gain. A complaint can be made even if the whistleblower is not able to identify a particular person to which the improper conduct relates to.

IMPROPER CONDUCT

Improper Conduct is any conduct which, if proved, constitutes a disciplinary action or a criminal offence. These include the following:

- criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
- failure to comply with legal or regulatory obligations;
- misuse of the Company's funds or assets;



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- an act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- unsafe work practices or substantial wasting of company resources;
- abuse of power by an officer of the Company; and
- concealment of any of the above

RAISING A CONCERN

A disclosure of Improper Conduct may be made by filling up a Whistleblowing Form as attached and email to info@polymerlink.in

PROTECTION

The Whistleblower or persons connected to him/her shall be protected from any detrimental action as a direct consequence of the disclosure. Additionally, the Whistleblower's identity and such other confidential information shall not be disclosed save with the Whistleblower's consent or otherwise required by law. Where the Whistleblower has chosen to reveal his/her identity, it is the Company's policy to provide assurance that the Whistleblower would be protected against reprisals and/or retaliation from his/her superior or head of department/division. The protection conferred under this Policy is not affected notwithstanding that the disclosure of the improper conduct does not result in any disciplinary action on the person against whom the disclosure was made, as long as the report was made in good faith, i.e. without malicious intent.

NOTIFICATION

The Whistleblower shall be informed of the result of any investigation and/or any action taken by the Company in respect of the disclosure in accordance with the Policy.

Polymer Link reserves the right to amend this Policy from time to time

Director:
Jagroop Singh Gill