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## **Nayara Energy Limited**

### Registered Office:

Khambhalia Post, P.O. Box 24, District Devbhumi Dwarka – 361305, Gujarat

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## **Whistle-Blower Policy**

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## DOCUMENT CONTROL

<b>Document Title</b>	Whistle-Blower Policy
<b>Document Owner</b>	Chief Compliance & Security Officer (CCSO)
<b>Recommended By</b>	Management Committee
<b>Reviewed By</b>	Audit Committee
<b>Approved By</b>	Board of Directors
<b>Approval Date</b>	30.5.2023
<b>Effective Date</b>	From the date of its approval
<b>Document Applicability</b>	This Policy is applicable to Nayara Energy Limited & its Subsidiaries (as and when approved by respective Board of Directors)
<b>Document Classification</b>	Public
<b>Document Distribution</b>	<ol style="list-style-type: none"><li>1. Company Intranet</li><li>2. Board of Directors</li><li>3. Company Official Website</li></ol>

## DOCUMENT HISTORY

Version Number	Change Details	Approver	Approval date
1.0	Introduction of the Policy	Board of Directors	01-Mar-2018
1.1	Change in title of responsible officers and changes owing to regulatory requirements, to the extent applicable	Board of Directors	15-July-2021
2.0	Procedural aspects moved to separate documents, realignment of roles, changes to certain procedural steps	Board of Directors	30-May-2023

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## 1) Introduction

- a) Nayara Energy Limited (the 'Company') adheres to highest standards of professional and ethical conduct. The Company strives to conduct its business dealings and affairs in a fair and transparent manner, adopting the highest standards of professionalism in compliance with all the applicable laws, rules and regulations.
- b) The Whistle Blower Policy(the "Policy") aims at putting in place a mechanism for Directors, Employees and Associate to report their genuine concerns internally about possible irregularities, governance weaknesses, financial reporting issues, actual or suspected fraud, violation of the Company's Ethics Code or other such matters (unethical activity).
- c) The reporting mechanism set out in this policy, encourages all employees to act responsibly to uphold the reputation of the Company. The Company ensures appropriate action for any concerns reported by the employees through this mechanism.
- d) The Policy aims to provide a non-threatening environment to the employees and safeguard them from reprisals or victimization, for whistleblowing in good faith.
- e) The Policy conforms to the requirements of the Companies Act, 2013 and Guidelines for Corporate Governance.
- f) Employees and Associates to report any unethical activity or misconduct or violation of Ethics Code that they observe through the whistle-blower mechanism. These include matters such as demanding or accepting bribes, dishonesty, abuse of powers, corruption, fraud, theft, embezzlement, misuse of funds, questionable accounting financial transactions, sexual harassment, leak of unpublished price sensitive information, discrimination, data breach or data theft, etc.
- g) Whistleblowing is the disclosure of information related to Inappropriate Conduct committed by Nayara Affiliates. Such Inappropriate Conduct is of concern to or could threaten the interests of Nayara Energy Limited and/or public at large.

## 2) Objective

- a) This policy aims at setting ethical boundaries and to provide an avenue for employees and other stakeholders to raise concerns on any violations of legal or regulatory or corporate requirements, and outlines the procedures for reporting, handling, investigating and deciding on the course of action to be taken in case inappropriate conduct/behaviour is/are noticed, reported or suspected.
- b) This policy furthermore aims not only at protecting the identity of the "Whistle-blower" but also protecting him/her from any subsequent retribution by the Company and Nayara Affiliates for using the mechanism.
- c) This policy also aims to fulfil the requirements of the Companies Act, 2013 with respect to establishment of a vigil mechanism for directors and employees to report genuine concerns or grievances. Further, this policy also provides for compliance with requirements of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, as amended, to the extent applicable to Nayara Energy Limited.

To meet the above objectives, the Board of Directors of the Company adopted this Whistle-blower Policy by formulating a procedure to bring to attention of the management, incidents of improper conduct without fear of victimization and made CCSO as person responsible for this whistle-blowing business process within the Company.

### 3) Applicability

This Policy shall be applicable to Directors, Employees and all Associates of the Company. This Policy shall also be applicable to the subsidiaries of the Company after adoption by the Board of Directors of the respective entities.

### 4) Definitions

- a) **Audit Committee:** means the Audit Committee constituted by the Board of Directors of the Company and having powers in compliance with provisions of section 177 of the Companies Act, 2013.
- b) **Associates:** All persons deployed under manpower supply or secondment agreements with the Company and/or discharging the employee support functions, advisors/consultants on retainer basis except law firms or lawyers/advocates.
- c) **Company:** Nayara Energy Limited.
- d) **Bribery/Corruption:** Bribery/Corruption generally involves abuse of power, abuse of authority, paying or offering money or providing or receiving anything of value, to obtain or retain a business or another advantage (that they would ordinarily not be entitled to) or to induce or reward someone for acting improperly. Bribes often involve payments (or promises of payments), but may also include providing/accepting inappropriate gifts and hospitality or the uncompensated use of services. Bribery can also occur in circumstances where the advantage or reward is being given or received indirectly to/by someone other than the person involved. Bribery includes advantages provided directly, as well as indirectly through an intermediary. Bribery/Corruption also include bribes, kickbacks, corrupt activities and facilitation payments.
- e) **Nayara Affiliate:** for the purpose of this Policy, means Associates (as defined above), auditors, customers, dealers, directors, franchisees, managerial employees, non-managerial employees, trainees and vendors of Nayara Energy Limited and its subsidiaries.
- f) **Defendant:** means any Nayara Affiliate against whom an allegation of inappropriate conduct has been made or any Nayara Affiliate who seems to have committed some Inappropriate Conduct and such conduct was revealed during an investigation.
- g) **Director:** Director means a person appointed under provisions of Companies Act, 2013
- h) **Disciplinary Action:** For the purpose of this Policy, shall have the same meaning as defined in the Disciplinary Policy.
- i) **Employee:** All persons on the rolls of the Company, part time or full time, temporary or permanent.
- j) **Fraud/Corporate Fraud:** As per the Companies Act, 2013 in relation to affairs of a Company or any body-corporate to include any act, omission, concealment of any fact or abuse of position committed by any person or any other person with the connivance in any manner, with intent to deceive, to gain undue advantage from, or to injure the interests of the Company or its shareholders or its creditors or any other person, whether or not there is any wrongful gain or wrongful loss. Fraud can include but not limited to, intentional misstating or falsifying information in corporate records, financial statements or omitting information required to be disclosed.
- k) **Good Faith:** Any act done or omitted to be done, with due care and caution is stated to be done or omitted in Good Faith. Conversely lack of due care and caution in

committing any act or omitting to do any act will not be in Good Faith. Without affecting the generality of the definition and for example, a communication shall be deemed to be in “good faith” if there is a reasonable basis for communication of Inappropriate Conduct.

- l) **Screening Committee:** Committee that is responsible for review of the preliminary enquiry report of Complaints recorded, in order to recommend detailed investigation or assigning it to be bogus/frivolous or not meriting detailed investigation.
- m) **Hotline Manager:** means an individual deputed with the Compliance & Security Department and so designated by CCSO.
- n) **Integrity Committee:** means the committee that reviews the detailed investigation report and recommends appropriate actions.
- o) **Investigation team:** means those persons authorized, appointed, consulted or approached by the Company to investigate matters reported in a Complaint.
- p) **Inappropriate Conduct:** Inappropriate conduct is any act, omission, concealment of any fact or abuse of position committed by any person or any other person with the connivance in any manner, with intent to deceive, to gain undue advantage from, or to injure the interests of the company or its shareholders or any other person whether or not there is any wrongful gain or loss. This will include misappropriation of assets, manipulation of records, misrepresentation of facts, bribery, collusion, fraud and corruption, violation of policies and procedures, of any applicable regulatory guidelines and Ethics Code, amongst others. Exceptions that have been duly granted in accordance with any relevant policy or procedure shall not be considered violations of the said policy
- q) **Protected Disclosure/Complaint:** means a concern raised by a Whistle-blower, having an association with the Company, through any whistle-blower complaint channel specified in this policy, made in Good Faith that discloses or demonstrates information that may evidence unethical or improper activity. Complaints should be factual or believed to be factual and not speculative in nature.
- r) **Sexual Harassment:** For the purpose of this Policy, shall have the same meaning as defined in the Prevention of Sexual Harassment Policy.
- s) **Third Party:** Includes all entities and individuals, other than Director, Employee, Associate and Subsidiaries of Nayara Energy Limited, with whom the Company has or may have contractual relationships. Without prejudice to the generality of the expression, Third Parties may include (but not limited to) consultants, agents, sales representatives, distributors, customs clearance agents, franchisees, vessel owners, dealers, traders, vendors, channel partners, contractors and suppliers, lawyers, tax advisers, introducers of business, brokers, lobbyists, bid participants and other professionals.
- t) **Triage:** assessment of the initial report of wrongdoing for the purposes of categorization, taking preliminary measures, prioritization and allocation
- u) **Unpublished Price Sensitive Information (UPSI):** Shall have the same meaning as defined in “Code of Conduct, Practices and Procedures for Prevention of Insider Trading and Fair Disclosures”.

Without prejudice to the above and only by illustration, ‘UPSI’ will mean any information, relating to the Company or its Securities, directly or indirectly, that is not

generally available information which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily including but not restricted to, information relating to the following:

- i) financial results;
- ii) dividends;
- iii) change in capital structure;
- iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions of an amount involving more than 20% of the networth of the Company as on the date of last audited financials;
- v) change in key managerial personnel
- v) **Whistle-blower.** means any person, Employee or Associate or customer or any individual, who files a complaint or alleges or discloses Inappropriate Conduct or behaviour of the defendant.
- w) **Whistle-blowing.** means the Complaint, allegation or reporting of wrongdoing, Inappropriate Conduct or behaviour including but not limited to corruption; criminal offences; breaches of legal obligation; miscarriages of justice; specific dangers to public health, safety or the environment; abuse of authority; unauthorised use of company funds or property; gross waste or mismanagement; conflict of interest; and acts to cover up of any of these.

## 5) Key Principles

### a) *Who can file a complaint?*

- i) Any person can file a complaint on the Companies hotline to disclose information relating to Inappropriate Conduct or wrongdoing. This may include.
  - o Directors
  - o Employees (including former Employees) of the Company
  - o Employees of other agencies deployed for the Company's activities, whether working from any of the Company's offices or any other location
  - o Third Parties (including participants in procurement or bidders), contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company
  - o Investors of the Company
  - o Customers of the Company
  - o Any other person having knowledge of commission of an Inappropriate Conduct in relation to the Company and acting in Good Faith.
- ii) If an Employee or Associate raises a Complaint to their supervisor/line manager, it is the duty of the line manager to report the same immediately through the Hotline Whistle-Blower Channels.

### b) *Protection extended to Whistle-blowers*

- i) Protection shall be granted to Whistle-Blowers making Complaints in Good Faith under this Policy. This also means that no action shall be taken against the

whistleblower, if the complaint was made in Good Faith, but no misconduct was confirmed on subsequent investigation.

- ii) Protection under this Policy would not mean protection from disciplinary action arising out of false, motivated, or vexatious allegations made by a Whistle Blower knowing it to be false or with a mala fide intention. If a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the CCSO may recommend to the CEO to take appropriate disciplinary or legal action against the concerned whistleblower. The Audit Committee shall be informed of any such recommendation.
- iii) Individuals shall be protected from Company's or its employees' retaliation, disadvantage or discrimination at the workplace linked to or resulting from whistleblowing. Without limitations, retaliation includes all forms of action or disadvantage such as dismissal, probation and other job sanctions; punitive transfers; harassment; reduced/extended duties or hours; withholding/denial of promotions or training; loss of job status and benefits; and threats of such actions.
- iv) Subject to other provisions of this Policy, the identity of a Whistle-Blower shall not be disclosed without his/her explicit consent. External stakeholders such as vendors, customers, business partners etc. have the opportunity to submit 'Complaints'; however, the Company is not obligated to keep 'Complaints' from non-employees confidential or to maintain the anonymity of non-employees. We encourage individuals sending 'Complaints' / raising any matter to identify themselves instead of sending anonymous 'Complaints' as it will assist in an effective complaint review process.
- v) Whistle Blower making any genuine Complaint within the scope of this policy shall be provided immunity by the Company from Disciplinary Action and liability under civil and administrative action, including those related to libel, slander, copyright and data protection which could have been instituted by the Company. However, it is made clear that the Company extends no such protection against any third-party claims except for any indemnity which may be available to any employee under any insurance taken by the company or under any other policy of the Company.
- vi) Directors, Employees and Associates shall have the right to refuse participation in any Inappropriate Conduct and are duty bound to report the matter under this Policy. They shall be protected from any form of retribution or discrimination by the Company or its employees, if they exercise this right.
- vii) Any other Company rule, agreement, instruction, SOP, document, etc. would not take effect to the extent it contradicts with the provisions of this policy including any rights and protection given to a Whistle-Blower under this policy.
- viii) Protection shall also be granted to Whistle-Blowers who have disclosed information anonymously, but have been identified subsequently.
- ix) Whistle-blowers whose life or safety are in jeopardy, are entitled to receive personal protection measures, to the extent practical and necessary.
- x) It is prohibited to use the Hotline channels for placing advertisement, spreading rumours, get even with someone, punish or insult someone.
- xi) The company will protect all Whistle-blowers filing Complaint in Good Faith from any type of retaliation or victimisation by the Company or its employees for making



use of the Whistle-Blower mechanism. The Whistle-blowers or complainants are strongly advised to withhold identifying information if he/she fears retaliation for filing a complaint. In such cases, complainant is expected to adequately provide relevant data or evidence to back up their claim. Retaliation against Whistle-blower(s) by any defendant(s) directly/indirectly, will be treated as a Misconduct meriting Disciplinary Action. The acts of retaliation by those not qualifying as Nayara Affiliates would be reported to the local law enforcement agency, at the discretion of the Integrity Committee/Audit Committee.

- xii) The Whistle-blower, any other Nayara Affiliates or anyone outside the Nayara Group can report acts of retaliation against the Whistle-blower, his/her life, property, lives of relatives and acquaintances. The CCSO will monitor complaints of retaliation on an ongoing basis.
- xiii) However, the Company does not guarantee protection to a Whistle-Blower, if the latter has disclosed the complaint or his identity to other persons/organizations.
- xiv) Protection shall not be provided where the complaints are ineligible/frivolous or are redirected under section 5D of this Policy

#### ***c) Reporting channels***

Nayara Energy has set up the following Hotline Whistle-Blower Channels to report any actual or suspected violations as spelt out in this Policy and the same may be reported using any one of the following hotline whistle-blower channels:

- (1) Web Interface: Visit [whistleblower.nayaraenergy.com](http://whistleblower.nayaraenergy.com)
- (2) Toll Free Hotline Telephone line and Interactive Voice Recording (IVR) System: Call our toll free number - 1800 266 2800.
- (3) Email: write to us at [hotline@nayaraenergy.com](mailto:hotline@nayaraenergy.com).
- (4) Post/Letter: Send a letter to our Corporate Office addressed to our Chief Compliance & Security Officer
- (5) In person: Meet our CCSO in person at our Corporate Office

Any other channel notified by CCSO from time to time.

Nayara Energy informs all contracting parties at the time of execution of contracts i.e. either when establishing or renewing contractual relationships, about this Policy and the means to file a complaint of Inappropriate Conduct.

#### ***d) Ineligible/Unfit Complaints***

Following matters, as defined in Section 4, shall not be treated as Protected Disclosure/Complaint under this policy. Where applicable, such complaints will be re-directed to other concerned teams. These complaints will neither be investigated by Compliance & Security team nor provide any protection to the complainant:

- i) General administrative matters or suggestions such as job enquiries, requests for contact details of other departments, general inquiries, advertising & marketing calls, performance feedback reports, etc.
- ii) For placing advertisement or spreading rumours

- iii) Sexual harassment related complaints. If any sexual harassment complaints are received on the hotline, they will be redirected to the POSH Committee in line with the Prevention of Sexual Harassment Policy (POSH) policy.
- iv) As a general principle, Employee grievances related to people management style, behavior issues, work related performance, general employee grievances, and delayed full and final settlements, will be redirected to HR helpdesk for resolution. Such complaints will be redirected only if the complainant reveals his identity and agrees to remain non-anonymous. Should the complainant not identify himself or does not agree to remain non-anonymous, the complaint will neither be redirected nor investigated.
- v) Complaints related to leakage of UPSI. If received, will be redirected to the Compliance Officer identified under "*Code of Conduct, Practices and Procedures for Prevention of Insider Trading and Fair Disclosures*".
- vi) If after the screening / investigation, it is identified that the complaints are not related to Inappropriate Conduct and are in regard to deviation of SOP, such complaints will be redirected to the CGCO.
- vii) In case frivolous complaints are being filed repeatedly by any person including a Director, Employee or an Associate which are not in Good Faith, stringent action will be taken against the complainant. We encourage employees to report genuine 'Complaints' and those submitted in Good Faith. In case of repeated frivolous complaints, CCSO may recommend to the CEO to take appropriate disciplinary or legal action against the whistle-blower. The Audit Committee shall be informed of any such recommendation.

***e) Confidentiality***

- i) It is the obligation of all the authorities referred to in this policy such as CCSO, Integrity Committee and the Audit Committee to ensure total confidentiality of the identity of the Whistle-Blower unless he/she agrees to be identified.
- ii) Notwithstanding the above, identity of the Whistle Blower may be disclosed wherever:-
  - (1) identification of the Whistle-blower is necessary to allow NAYARA or the appropriate law enforcement officials to investigate or respond effectively to the disclosure.
  - (2) identification is required by law or under Nayara's rules and regulations, where a false accusation has been maliciously made.
  - (3) the person accused is entitled to the information as a matter of legal right or under Nayara's rules and regulations set out in the Disciplinary Policy.

However, the Company will not be responsible to maintain and protect the identity of a Whistle-blower, if the latter has disclosed/made the complaint to other persons/organizations. Further, where a complainant chooses to remain anonymous, the complaint is expected to be accompanied with strong evidence and data.

***f) Investigation***

- i) Any investigation that is conducted shall be done in an independent manner, free from any bias and prejudices. The whistle-blower or any person having a Conflict of Interest shall neither be the investigator nor be a member of the Investigation Team nor any other team constituted under this policy.
- ii) The Investigation Team shall have unrestricted access to people, premises, documents and data for the purpose of the investigation. Any non-cooperation including inordinate delays will be construed to be a Misconduct under Disciplinary Policy. In addition, such non-cooperation may become a subject matter of investigation of the complaint.
- iii) As a result of an investigation, the Company may take disciplinary or corrective action if an improper or unethical act is found to have been committed.
- iv) As a general principle, progress or the final outcome of the investigation may not be shared with the whistle-blower. A complaint closure mail shall be sent to the Whistle-blower upon closure.

***g) Grievances***

If a Whistle-blower feels aggrieved with the disposition of his complaint or if the Whistle-blower feels that he is entitled to or has not been provided protection or has been disregarded/victimized or there are exceptional circumstances, he may make a representation in writing to the Chairman of the Audit Committee who will take such action as he considers necessary to redress the grievance as per the direction of the Audit Committee.

Such communications to Chairman of the Audit Committee can be made by sending an e-mail to [deepakkapoor0701@gmail.com](mailto:deepakkapoor0701@gmail.com)

**6) Key Activities**

***a) Audit of Whistle-Blowing Function***

Internal Audit Department shall perform review of the Hotline Whistle-blower process functioning, including receiving and handling of complaints, decision on whether investigation is required, reasons for considering complaints as 'Frivolous', investigations conducted and their outcomes, etc.

***b) Commitment to report violations***

The Company requires all its Directors and employees to sign an ethics declaration that confirms their obligation and commitment to report all acts of improper/inappropriate conduct, fraud, corruption through ethics & compliance policies through whistleblowing channels as set in this policy.

***c) Record Keeping***

- i) 'Protected disclosures' and investigatory records will be kept confidential to the extent possible, save for the need to conduct an adequate investigation, report results to the authorities/regulators/investigation agencies, take necessary corrective/Disciplinary Actions, or implement protective measures.
- ii) Whistle-blower Complaints in the form of emails and electronic records (website complaints, recorded phone calls, etc.) and also other records (such as complaints in paper form, investigation reports, discussion papers, approval notes, etc.)

pertaining to this policy shall be treated as restricted records and also retained for a period as mandated by applicable laws and policy of the company pertaining to document retention.

- iii) The records pertaining to Protected Disclosures are confidential in nature. Hence the disposal strategy of the Whistle-blower records to be adopted post retention period shall:
  - (1) ensure shredding of physical papers; and
  - (2) permanent deletion of electronic records (if not otherwise required for other purpose).

## **7) Approval of Policy and Amendments thereto**

- a) This Policy and its amendments, if any, shall be approved and recognized as valid for Nayara Energy Limited by a resolution of Nayara Board of Directors.
- b) The Policy shall be reviewed and may be amended from time to time on the happening of the following events:
  - i) changes in applicable legislation or practice of its enforcement;
  - ii) changes in powers of responsible persons or structural units; or
  - iii) any other reason, as deemed appropriate.
- c) An explanatory note providing the rationale for the changes in the policy and/or procedure on the basis of analysis of the existing policy and procedure will be provided by the CCSO.
- d) Amendments related to the Policy (except Annexures to the Policy) shall be introduced solely through the CCSO and approved by the Board of Directors. All requests with proposals to make amendments shall be made to the CCSO, who will be responsible for reviewing and analysing the request following which the request may be admitted and the Policy may be appropriately amended. The amended Policy shall be put for recommendation from the Management Committee and review by the Audit Committee. Once recommended and reviewed, the amended Policy shall require a resolution of the Board of Directors before it is given effect.
- e) Amendments that are related to procedures (i.e. Annexures 1, 4 and 5 to the Policy) shall be introduced solely through the CCSO and approved by the Management Committee. The amendments will be effective from the date of approval by the Management Committee. Similarly, any new Annexure (i.e. any new procedure to implement this Policy) shall be introduced by the CCSO and approved by the Management Committee. Subsequently, such amendments or new procedures shall be laid before the Board of Directors for noting at the next quarterly Board meeting to be held after adoption by the Management Committee.
- f) Amendments to the related recommended format of administrative documents (Annexure 2 and 3 to the Policy) shall be approved by CCSO. Similarly, any new Annexure of similar nature shall be approved by CCSO.

## **8) Communication and Training**

- a) To create an awareness, this Policy shall be hosted on the Company's intranet and also freely published on the official website of Nayara Energy Limited.
- b) The Company will impart necessary trainings to all new hires and also provide periodic refresher trainings to its existing Employees and Associates to maintain and reinforce compliance.

## 9) Miscellaneous

- a) In this Policy wherever context permits singular shall mean plural and plural shall mean singular, masculine gender shall mean feminine gender and vice-versa.
- b) This Policy shall be read along with the Ethics Code.
- c) This Policy can be changed, modified or amended at any time by the Board of Directors of Nayara Energy Limited. However, if any difficulty arises in giving effect to the provisions of this Policy, the CEO may, in writing, make such provisions, as appear to be necessary or expedient for removing the difficulty.
- d) For any clarifications on this Policy, please approach the CCSO by writing to [ccso@nayaraenergy.com](mailto:ccso@nayaraenergy.com).
- e) Any violation of this Policy shall be deemed to be a misconduct and will be dealt with the provisions of Disciplinary Policy of the Company and applicable laws.
- f) Terms not defined herein but defined in any other policy of the company shall have the same meaning, as defined therein.

## 10) References

Reference
Companies Act, 2013

## 11) Annexure to the Policy

Annexure 3	Format of Whistle-Blower Complaint Form
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### Annexure 3: Format of Whistle-Blower Complaint Form

**PURPOSE:** The Compliance & Security Department of Nayara Energy receives and tracks complaints about Inappropriate Conduct or behaviour, such as demanding or accepting bribes, questionable accounting or fraudulent financial transactions, misuse of funds, abuse of powers, theft, embezzlement, sexual harassment, health & safety risks, breach of company code, policies & laws by Nayara Energy Directors, Employees and Associates, amongst others.

**OBJECTIVE:** The objective of the Hotline Whistle-blower Management Program is to establish a vigil mechanism for directors and employees to report Inappropriate Conduct or behaviour, genuine concerns or grievances without fear of punishment or unfair treatment, and, when appropriate, investigate and attempts to resolve Whistle-blower complaints.

**RETALIATION:** No Company officer or Management personnel may terminate, demote, suspend or take other similar adverse employment action against any Whistle-blower or complainant because he or she has in good faith filed a whistle-blower complaint. An act of retaliation should be reported immediately to the **Chairman, Audit Committee**, who will ensure the investigation on such report.

**INSTRUCTIONS:** Please enclose the completed form in an envelope marked “Confidential” and mail it to:

**Chief Compliance & Security Officer**

Nayara Energy Limited

5th Floor, Jet Airways Godrej BKC,

Plot No. C-68, G Block, Bandra Kurla Complex,

Bandra East,

Mumbai – 400051

To file your complaint online, go to [whistleblower.nayaraenergy.com](http://whistleblower.nayaraenergy.com) and click on the “Web Form” link on the left side of the page. Each complaint is assigned and recorded with a unique tracking number and carefully evaluated to determine whether it warrants an investigation. The Compliance & Security Department will provide you with your tracking number if you provide us with your contact information.

You may also email the completed form to [hotline@nayaraenergy.com](mailto:hotline@nayaraenergy.com)

#### Disclosure – Select One

- ☐ Anonymous - If you elect this status, we will keep your personal information Confidential, to the extent this is not in contravention of Company’s Statutory obligation.
- ☐ Consent to Disclosure - I consent to the disclosure of my identity to the Hotline Whistle-blower Team in order to further investigation of this complaint.
- ☐ Non-Consent to Disclosure - I do not consent to disclosure of my identity to Hotline Whistle-blower Team, but I understand that non-disclosure of my identity may hinder the Hotline Whistle-blower Team’s ability to investigate and appropriately address the complaint.

**Your Contact Information (Do NOT complete if filing anonymously)**

**First Name:** \_\_\_\_\_

**Last Name:** \_\_\_\_\_

**Your Status:**

- ☐ Active / Former Company Employee
- ☐ Associate
- ☐ Vendor / Supplier / Contractor / Third Party/ Franchisee / Dealer
- ☐ Investor
- ☐ Customer / Public

**Address Line 1:** \_\_\_\_\_

**Address Line 2:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **Zip:** \_\_\_\_\_

**Email Address:** \_\_\_\_\_

**Contact Telephone / Mobile:** \_\_\_\_\_

**Best Contact Time:**

- ☐ Morning
- ☐ Afternoon

Use this section to provide details of your allegation(s). Please clearly state the subject of your complaint and provide names, dates, times, and locations in the applicable fields. Also state how you became aware of the problem, efforts made thus far to correct the problem, and let us know what other offices (including outside Company offices) you have contacted for assistance, and if you have outstanding complaints with those offices. If you have supporting documentation or chronologies, it would be helpful to enclose copies of those documents along with your complaint filing.

**What is your complaint about? – Select One**

- ☐ Dishonesty
- ☐ Intentional waste, mismanagement, abuse of authority, theft, misuse of Company property
- ☐ Breach of laws/Ethics Code/Policies/Regulations/SOPs
- ☐ Questionable accounting transactions
- ☐ Corruption/Bribery
- ☐ Coercive practices
- ☐ Conspiracy/collusive practices
- ☐ Health & Safety risks
- ☐ Abuse of vulnerable adults
- ☐ Concurrent employment

- ☐ Unauthorised social media usage
- ☐ Leak of unpublished price sensitive information
- ☐ Sexual Harassment
- ☐ Any other in appropriate conduct related: \_\_\_\_\_

**Person(s) - who committed the alleged wrongdoing? What department or office is involved?**

**Person's Status – Select One**

- ☐ Active / Former Company Employee
- ☐ Associate
- ☐ Vendor / Supplier / Contractor / Third Party / Bidder / Franchisee / Dealer
- ☐ Investor
- ☐ Customer / Public

**Person's First Name:** \_\_\_\_\_

**Person's Last Name:** \_\_\_\_\_

**Person's Department:** \_\_\_\_\_

**Allegation / Inappropriate Conduct Details** - Provide a summary of your complaint, to include event chronology if appropriate. Number the allegations. Use additional paper if necessary.

1. What did the subject do or fail to do that was wrong?

2. When did the incident occur?

3. When were you made aware of the problem?



4. Where did the incident take place?

5. What rule, regulation, or law do you believe to have been violated?

6. Is the Management aware of the problem?

- ☐ Yes
- ☐ No

7. Did anyone attempt to conceal this incident? If yes, provide details

- ☐ Yes
- ☐ No

8. Briefly summarize how you believe our office can assist you regarding your complaint.

9. Have you discussed the incident with anyone else such as your colleagues? If yes, who?

10. Have you reported this matter to any other organizations/agencies?

- ☐ Yes
- ☐ No

If Yes, Which Organization / Agency?

When?

What is the status of that complaint?

- ☐ Open
- ☐ Under Investigation
- ☐ Closed
- ☐ Unknown

**To whomsoever it may concern**

I certify that all of the statements made in this complaint are true, complete, and correct, to the best of my knowledge.

Signature

Name

Date

*The recommended template of this form may be modified or replaced by CCSO from time to time. The latest template in use shall be placed in this annexure.*