

Whistle Blower Policy

1. Objective:

- The Policy has been framed with a view to raise the standard of ethics, morals & integrity and to encourage a culture of openness & transparency in dealings between employees / agencies /clients and all other individual or associates.
- To encourage the employees and all the associated parties to the Company to report unethical behaviors, malpractices, wrongful conduct, fraud, violation of the company's policies & values, violation of law without any fear of retaliation.

2. Applicability:

- All employees/management
- Vendors
- Agency/Contract Staff
- Consultants
- Other Trainees
- Any other individual/Associates connected with the company like Warehouse owners, Client, Banks

3. Whistle Blower Email IDs:

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| Whistle Blower Committee | WBPcom@nbhcindia.com |
| Review Committee | reviewcom@nbhcindia.com |

4. Guidelines for Reporting Incident / Compliant

- Any employee or any entity/individual dealing with the Company who observes any unethical & improper practices or wrongful conduct shall make a disclosure to the WBP Committee not later than 15 consecutive calendar days after becoming aware of the same.
- Reports can be sent by post/courier to the HO, in a confidential cover marked 'For the attention of Whistle Blower Committee' or 'For the attention of Review Committee', as the case may be. The records/ report will include:
 - Name/designation and location of the whistleblower, name, address and relationship with the Company (in case of a vendor/client/associate of the Company)
 - Facts of the matter
 - Evidence of the matter, if any
- Confidentiality of the whistle blower shall be maintained to the greatest extent possible. In case of any incident reported pertains to any member of the WBP Committee, and higher management/Board Members of the Company, they shall be directly reported to the Review Committee, which will investigate into the case.
- The Whistle Blower/Complainant's role is that of reporting party with reliable information. They are not required to act as investigators nor would determine the appropriate or remedial action. They should also not act nor participate in any investigation activities unless warranted otherwise.
- The WBP Committee shall appropriately and expeditiously investigate all whistle blower complaints received by them. WBP Committee shall have right to call for any information/document and examination of any employee and management of the Company or other person(s), as they may deem appropriate

for the purpose of conducting investigation they shall mandatorily adhere to scope and procedure outlined by WBP Committee for the investigation.

- A report shall be prepared after completion of investigation and the WBP Committee shall consider the same and recommend appropriate action like recommendation to reprimand, take disciplinary action, impose penalty /punishment, termination or suspension of any contract or arrangement or transaction to HR which needs to comply with the recommendation given.
- However, if after due investigation, the employee or the management personnel against whom the allegations were made and investigated, is found to be innocent/not guilty, the same is to be communicated to him by means of a letter signed by the WBP Committee authorized person, suitably worded to sooth his hurt feelings.
- Upon completion of investigation & submission of report, after the official/employee is found guilty and punished, the incident reporter will get an award of Rs. 10,000/- or more (depending on the intensity of the issue) as a token of appreciation.
- The Company reserves the rights to amend or modify the policy in consultation with the management/Board of the Company.
