

WHISTLEBLOWER POLICY

600.0 OBJECTIVE

Singer India Limited (The Company) believes in complete transparency in and fair conduct of its affairs as a part of good Corporate Governance. The Whistleblower Policy is fundamental to Singer India's philosophy of keeping the integrity at its highest level.

This policy provide directors, employees, ex-employees, Dealers, Vendors and customers of the Company an avenue to raise concerns in line with Singer India's commitment to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.

This policy is intended to assist persons who believe they have discovered malpractices 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 been investigated under the harassment, grievance or disciplinary policies and procedures.

600.1 SCOPE

All permanent employees, contractual employees, customers, vendors and any other person having an association with Singer India Limited can be a Whistleblower.

600.2 FUNDAMENTAL ELEMENTS OF THE POLICY

The Whistleblower policy is intended to cover serious concerns that could have a significant impact on the Company, such as actions (actual or suspected) that:

- Abuse of authority
- Breach of contract
- Manipulation of company data/records
- Any unlawful act whether Criminal/Civil
- Pilferation of confidential information
- Wastage/misappropriation of company funds/assets
- Breach of Company Policy or failure to implement or comply with any approved Company Policy

600.3 PROCEDURE FOR REPORTING AND DEALING WITH DISCLOSURE

The Whistleblower is required to fill the Protected Disclosure Form as per Annexure I. The disclosure should be made in writing. The Form can be submitted by hand-delivery, courier or by post addressed to the Whistle Officer (hereinafter called the "Ombudsperson") appointed by the Company.

The Protected Disclosure Form can also be scanned and sent via email to the email id of the Ombudsperson

The Whistleblower should bring the concern at the earliest opportunity, not later than 30 days, of the suspected malpractice/impropriety/violation/breach noticed by him/her, so that timely action can be taken.

600.3.1 Ombudsperson

The practice of this policy will be overseen by the Ombudsperson.

The Ombudsperson will be the Managing Director and if the complaint is by or against senior Management (Managing Director/Director of the Company) the Ombudsperson will be the Chairman of the Audit Committee appointed by the Board of Directors and a copy of complaint in such cases should be marked to the Chairman of the Company. On receipt of initial complaint, the Ombudsperson will acknowledge receipt of the complaint within 48 hours and proceed to carry out the initial investigation.

The Managing Director will bring to the notice of the Chairman of the Audit Committee and the Chairman of the Company the complaints which are of serious nature against any employee irrespective of his/her level.

OMBUDSPERSON CONTACT DETAILS

1. Managing Director : Mr. Rajeev Bajaj

E-mail: rbajaj@singerindia.net Mobile: +91-9811283711

2. Chairman of the Audit Committee: Mr. P. N. Sharma

E-mail: pnssharma@hotmail.com

Telephone No. +91-11-40617777

Address:

Singer India Limited,
A-26/4, 2nd Floor,
Mohan Cooperative Industrial Estate
New Delhi – 110 044

600.4 PROCEDURE FOR REDRESSAL OF GRIEVANCE

On receipt of the valid complaint from a Whistleblower, the Ombudsperson may perform all such acts as may deem fit and appropriate to safeguard the interest of the Company.

1. Ensure that the policy is being implemented
2. Conduct the enquiry in a fair, unbiased manner
3. Ensure complete fact-finding

600.4.1 Documentation of the Enquiry

1. Ascertain prima facie the credibility of the charge. If initial enquiry indicates further investigation is not required, close the issue
2. Ensure that necessary safeguards are provided to the Whistleblower
3. Maintain strict confidentiality
4. Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom
5. A report shall be prepared after completion of investigation, which shall be submitted to the Managing Director of the Company with recommendation for an appropriate course of action, suggested disciplinary action, including dismissal, and preventive measures within 15 days

600.4.2 Investigation Subject

The investigation subject is the person / group of persons who are the focus of the enquiry / investigation (the accused). Their identity would be kept confidential to the extent possible. The

accused will be informed of the allegations against him/her at the outset of the formal investigation and he/she shall be given reasonable opportunity to defend his/her case during the investigation process.

1. Provide full co-operation to the Investigation team and not to interfere with or obstruct the investigation process. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be influenced, coached, threatened or intimidated by the accused
2. Be informed of the outcome of the investigation
3. Accept the decision of the Ombudsperson
4. Maintain strict confidentiality

600.4.3 Harassment or Victimization

This policy should not be used as a tool for victimization, making false allegation or acting malafide. Harassment or victimization of the complainant shall not be tolerated and could constitute sufficient grounds for dismissal of the concerned employee.

Any employee who is found to be making baseless, reckless, malicious or deliberately false allegation shall be subject to disciplinary proceedings which may extend to termination of employment.

A Whistleblower has the right to protection from retaliation. But this does not extend to immunity for complicity in the matters that are the subject of the allegations and investigation.

In exceptional cases, where the complainant is not satisfied with the outcome of the investigation carried out by the Ombudsperson, he / she can make a direct appeal to the Chairman of the Company.

600.4.4 Confidentiality

The Whistleblower should make it clear that they are making their disclosure within the terms of the Company's Whistleblower policy. This will ensure the recipient of the disclosure realises this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity.

600.4.5 Anonymity

Normally individuals should make disclosures internally. The identity of the Whistle blower will be protected at all stages in any internal matter. While the Company can provide internal anonymity, it cannot guarantee this if external legal action flows from the disclosure.

600.4.6 Anonymous Allegations

1. Whistleblower must give their names and contact details to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified
2. Concerns expressed anonymously SHALL NOT BE investigated BUT subject to the seriousness of the issue raised the Ombudsperson can initiate an investigation independently

600.4.7 Communication with Whistleblower

The Whistleblower shall receive acknowledgement on receipt of the concern. The extent of contact between the complainant and the body investigating the concern shall depend on the nature of the issue and the clarity of information provided. Further information may be sought from him/her. Subject to legal constraints, he/she shall receive information about the outcome of any investigations.

600.4.8 Suggested Penal Provision

- a. Counseling & issue of a Warning letter
- b. Withholding of promotion / increments
- c. Bar from participating in bonus review cycle
- d. Termination from employment
- e. Cancellation of Orders placed as per Purchase/Work Order
- f. Recovery of monetary loss suffered by the Company
- g. Legal proceedings

600.5 RETENTION OF DOCUMENTS AND REPORTS

All Initial Communications, documented along with the results of Investigation relating thereto, shall be retained by the HR Department for a minimum period of 5 (five) years or as mentioned in applicable law, if any.

600.6 CHANGES TO POLICY

This policy can be changed, modified, rescinded or abrogated at any time by the Managing Director of Singer India limited.

Protected Disclosure Form

Name of the Whistleblower: Designation:
 Contact Number: E-mail:
 Location/Address:

 Place where the alleged complaint occurred:

Name of the Whistleblower: Designation:
 Contact Number: E-mail:
 Location/Address:

 Place where the alleged complaint occurred:

Name of the Investigation Subject (Accused).....Designation:.....
 Department..... Location

In case of multiple Subjects:
 Name of the 2nd Investigation Subject..... Designation:.....
 Department..... Location

Sequence of events (please provide Date/Time/place):

Sources of Information:

List of Attachments:

1. 2.
3. 4.

Any other information that you may like to provide:

I hereby declare that the accompanying statements and supporting documentation (if any) is true and correct to the best of my knowledge and in complete good faith.

Date:

Signature of the Whistleblower