

WHISTLEBLOWER POLICY For Vendors

In compliance with Clause 25 of Tata Code of Conduct and in furtherance with Tata Steel Downstream Products Limited's ("Company") policy to encourage and protect genuine Whistleblowing by Vendors, a Vendors' Whistleblowing Protection Policy("Policy") has been developed.

Definitions

- "Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith and which discloses information that may evidence demand for illegal gratification and/or improper activity of serious nature, by any Employee, Director or Vendor.
- "Vendor Whistle Blower" means a person/organization registered in the Vendor database of the Company , making a Protected Disclosure and thereafter extending whatever assistance may be required in establishing facts mentioned in the Protected Disclosure.

Procedure

- Protected Disclosures should preferably be reported in writing i.e in ink or electronically, and should be factual(not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower
- Misconduct concerning the Ethics Counsellor and employees at the levels of Sr General Manager and above , should be addressed to the Chairperson of the Audit Committee of the Company and those concerning other employees, should be addressed to the Ethics Counsellor of the Company.
- The Whistleblower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistleblowers

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Protection to the Vendor Whistleblower:

- The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Vendor Whistleblowers while conducting business with the Company.
- The Vendor Whistleblower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/orders, refusal from issuance of RFQ(Request For Quotation) to them , or any direct or indirect use of authority to obstruct the Vendor Whistleblower from continuing to execute their jobs, including making further Protected Disclosures.
- Should, in spite of best efforts by the Company, the identity of the Vendor Whistleblower become known during the investigation, the Chief/Head of the concerned user departments, shall ensure that the Vendor Whistleblower, is provided with all the assistance required to execute existing orders.

- Under no circumstances, subjects against whom the disclosures have been made compel investigator to disclose the identity of the Vendor Whistleblower.

Disqualifications:

Any abuse of this protection by vendors will warrant disciplinary action.

Ethics Committee:

The Company has constituted the Ethics Committee ("the Committee"). In case a Vendor Whistleblower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the Ethics Counsellor, giving them specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Ethics Committee for their examination. The Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

Amendment:

The Company reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Notification to this Policy:

Head Procurement shall ensure that an approved copy of this Policy and its subsequent amendments if any, are notified in writing/via email, to all the vendors engaged by the company.



Abraham G Stephanos
Managing Director