

SIPL	HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS	Document No: HRD/PRO/02
		Revision No: 00
	Whistle Blowing Policy	Revision Date: 01.01.2024

1. Purpose

The whistleblowing policy of Sunvisors India aims to provide a mechanism for employees, contractors, suppliers, customers, and other stakeholders to report concerns about unethical behavior, misconduct, or violations of company policies. This policy promotes transparency, integrity, and accountability within the organization.

2. Scope

This policy applies to all individuals associated with Sunvisors India, including employees, contractors, suppliers, customers, and other stakeholders. It covers a wide range of concerns, including but not limited to fraud, corruption, conflicts of interest, discrimination, harassment, safety violations, environmental issues, and financial misconduct.

3. Reporting Procedures

a. Reporting Channels: Reports can be made through the following channels.




- Human Resources department
- Ethics Committee
- Anonymous reporting platform (if available)

b. Confidentiality: Sunvisors India is committed to maintaining the confidentiality of whistleblowers. Reports will be handled discreetly, and the identity of the whistleblower will be protected to the fullest extent possible.

c. Anonymous Reporting: Whistleblowers have the option to report concerns anonymously through the designated reporting channels. However, providing contact information can assist in the investigation process.

Whistle blowing and handling.

- Document the problem/suggestion/information and write it on a piece of paper and put it into a specified box kept at the announced location either by disclosing your identity or anonymously.
- The box would be opened at regular intervals i.e. Once a week in the presence of the pre-constituted committee members and shall be dealt with by the committee, in a transparent and prudent manner.

			89
Prepared By Bhoopendra Singh	Approved By Rahul Rawat	Issued By Bhoopendra Singh	Page

SIPL	HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS	Document No: HRD/PRO/02
		Revision No: 00
	Whistle Blowing Policy	Revision Date: 01.01.2024

- If any matter is found to be of a serious nature, a proper investigation would be conducted in a fair & prudent manner to detect truth.
- Suitable Disciplinary action would be taken as deemed fit, along with preventive measures to avoid the re-occurrence of the matter.
- In case the disclosure is not proved, the matter shall be extinguished.
- The identity of the Employee disclosing the information shall be kept confidential and he/she would be suitably awarded if matter is found to be of substance.

In exceptional cases, where the Employee is not satisfied with the outcome of the investigation and the decision, the matter may be referred to the board of directors/ MD.

4. Protection Against Retaliation




Sunvisors India prohibits retaliation against individuals who make good faith reports under this policy. Retaliation includes but is not limited to harassment, discrimination, demotion, suspension, termination, or any adverse action because of whistleblowing activities.

5. Investigation Process

- a. Initial Assessment: Upon receiving a report, Sunvisors India will conduct a preliminary assessment to determine the nature and seriousness of the reported misconduct.
- b. Investigation: If warranted, a designated team or external investigator will conduct a thorough and impartial investigation. Whistleblowers may be contacted for additional information or clarification during the investigation.
- c. Follow-Up and Resolution: After completing the investigation, Sunvisors India will take appropriate actions based on the findings. This may include disciplinary measures, corrective actions, policy revisions, or other steps to address the reported misconduct.

6. False Reporting

Knowingly making false or malicious reports under this policy is strictly prohibited and may result in disciplinary action, including termination of employment or legal consequences.

			90
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	

SIPL	HUMAN RESOURCE MANAGEMENT SYSTEM PROCESS	Document No: HRD/PRO/02
		Revision No: 00
	Whistle Blowing Policy	Revision Date: 01.01.2024

7. Non-Retaliation Obligation

All employees, managers, and stakeholders have a duty to cooperate with investigations and refrain from engaging in retaliation against whistleblowers. Failure to comply may lead to disciplinary action.

8. Training and Awareness




Sunvisors India will provide training and awareness programs to educate employees and stakeholders about the whistleblowing policy, reporting procedures, and the importance of ethical conduct.

9. Review and Updates

This policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations. Updates and revisions will be communicated to all stakeholders as necessary.

10. Monitoring & Measurements - KPI

Description	Measurable	Frequency
Fraud	No. of cases reported	Monthly
Corruption	No. of cases reported.	
Misconduct	No. of cases reported	Monthly
Violations of company policies	No. of cases reported	Monthly

			91
Prepared By	Approved By	Issued By	Page
Bhoopendra Singh	Rahul Rawat	Bhoopendra Singh	