



WHISTLE BLOWER POLICY

OBJECTIVE

To provide Directors, Employees, Customers and Vendors an avenue to raise concerns, in line with the commitment of HOPL to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication. It also provides necessary safeguards for protection of Directors/ Employees/ Customers/ Vendors from reprisals or victimization for whistleblowing in good faith.

SCOPE

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, child or forced labour issues, discrimination and harassment, corruption and bribery issues, anti-competitive practices, information security concern, violation of company rules, manipulations, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of which the interest of the Company is affected and formally reported by whistle blowers concerning its employees.

COVERAGE:

HOPL, including associate companies

MAIN FEATURES:

The whistle blower policy is intended to cover serious concerns and risk assessment that could have a large impact on HOPL, such as actions (actual or suspected) that:

- are of unethical behaviour
- are about actual or suspected fraud or violation
- are about violation of the company's code of conduct or ethics policy which may lead to incorrect financial reporting
- are not in line with applicable company policy
- are unlawful or otherwise amount to serious/ improper conduct

SAFEGUARDS

Harassment or victimization

Harassment or victimization of the complainant will not be tolerated and could constitute sufficient grounds for dismissal of the concerned employee.

Confidentiality

Every effort will be made to protect the complainant's identity, subject to legal constraints.

Anonymous allegations

Complainants must put their names to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously WILL NOT BE usually investigated, BUT subject to the seriousness of the issue raised, the authorised person can initiate an investigation independently.

Malicious allegations:

Malicious allegations by Director/ Employee/ Customer/ Vendor may result in disciplinary action.

DEFINITIONS

Complainant (Whistle blower)

Director/ Employee/ Customer/ Vendor making a disclosure under this policy is commonly referred to as a complainant (whistle blower). The complainant's role is as a reporting party, he/she is not an investigator. Although the complainant is not expected to prove the truth of an allegation, the complainant needs to demonstrate to the authorised person, that there is sufficient ground for concern.

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Authorised Person

The Authorised Person, apart from being a full-time senior employee, will be well respected for his/her integrity, independence and fairness. He/ She would be authorised by the Board for the purpose of receiving all complaints under this policy and ensuring appropriate action.

Reporting

The vigil mechanism/whistleblowing procedure shall provide for adequate safeguards against victimization of Director/ Employee/ Customer/ Vendor who avail of the vigil mechanism and is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported to the Authorised Person. Annexure 1 provides the necessary contact details.

Investigation

All complaints received will be recorded and looked into. If initial enquiries by the authorised person indicate that the concern has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision documented. Where initial enquiries indicate that further investigation is necessary, this will be carried through either by the authorised person alone, or by a committee nominated by the authorised person for this purpose. The investigation would be conducted in a fair manner, as a neutral fact finding process and without presumption of guilt. A written report of the findings would be made.

Investigation Result

Based on a thorough examination of the findings, the committee (or authorised person) would recommend an appropriate course of action to the Director of HOPL. Where an improper practice is proved, this would cover suggested disciplinary action, including dismissal, if applicable, as well as preventive measures for the future. All discussions would be documented as minutes of the meetings and the final report will be prepared accordingly.

Investigation Subject

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

Communication with Complainant

The complainant will receive acknowledgement on receipt of the concern. The amount of contact between the complainant and the body investigating the concern will 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 will receive information about the outcome of any investigations.

Changes to Policy

This policy can be changed, modified, rescinded, or abrogated at any time by HOPL.

ACCOUNTABILITIES:

Director/ Employees/ Customers/ Vendors

- Bring to early attention of the company any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern.
- Avoid anonymity when raising a concern.
- Co-operate with investigating authorities, maintaining full confidentiality.
- The intent of the policy is to bring genuine and serious issues to the fore and it is not intended for petty complaints. Malicious allegations by Director/ Employee/ Customer/ Vendor may attract disciplinary action.
- A complainant 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.

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- In exceptional cases, where the complainant is not satisfied with the outcome of the investigation carried out by the Authorised Person, he/she can make a direct appeal to the Chairman of the internal complaint committee of HOPL.

Authorised Person

- Ensure that the policy is being implemented.
- Ascertain prima facie the credibility of the charge. If initial enquiry indicates further investigation is not required, close the issue.
- Document the initial enquiry.
- Where further investigation is indicated carry this through, appointing a committee if necessary.
- Provide reports to the Director of HOPL.
- Acknowledge receipt of concern to the complainant, thanking him/her for initiative taken in upholding the company's business conduct standards.
- Ensure that necessary safeguards are provided to the complainant.

Authorised Person/Committee

- Conduct the enquiry in a fair, unbiased manner.
- Ensure complete fact-finding.
- Maintain strict confidentiality.
- Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom.
- Recommend an appropriate course of action - suggest disciplinary action, including dismissal, and preventive measures.
- Minute Committee deliberations and document the final report.

Director

- Ensure necessary execution of action plan of recommendations of the Authorised Person/ Committee.

Investigation Subject

- Provide full co-operation to the investigation team.
- Be informed of the outcome of the investigation.
- Accept the decision of the authorised person.
- Maintain strict confidentiality.

AUTHORISED PERSON & CONTACT DETAILS:

Authorised Person: Bhavesh Shah

Contact Details:

Address: 24 - 39, Second floor, Maruti Complex, Chhani Road, Baroda 390002, Gujarat, India

Phone: +91 265 2775217, 2774884

E-mail: info@hariorgo.com

RETENTION OF DOCUMENTS

All disclosures are protected and documented along with the results of investigation relating thereto, and shall be retained by the Company for a period of 5 (five) years or such other period as specified by any other law in force, whichever is more.

Approved by:



Director