



## WHISTLE BLOWER POLICY

Policy No	GLOCHEM/HR/POL-016	Version No	01
Department	HUMAN RESOURCE		

### Objective

To ensure Glochem creates an avenue for employees, trainees, consultants and vendor organizations to confidentially report suspected misconduct within the Glochem and ensure appropriate protections against retaliation.

This policy outlines the policy and procedures for reporting, investigating and responding to suspected misconduct, including protections for the individuals or organizations which raised the issue.

### Scope and Application

This policy relates to misconduct within the Glochem. Misconduct means any illegality, breach of Glochem policies, abuse of authority, danger to health, safety, information security and any other activity that undermines the core values of the organization. Examples include, but are not limited to, corruption, fraud, theft, misrepresentation, misuse of Glochem property and retaliation against whistle-blowers.

The terms of this policy apply across all units, plants and sites of Glochem and its employees, trainees, consultants and vendor organizations.

### Policy

- **Duty to Report**

Glochem employees, trainees, consultants and vendor organizations have a duty to promptly report suspected misconduct associated with any activity of Glochem and to cooperate fully and truthfully in any internal or external review, audit, or investigation conducted by or on behalf of Glochem. Failure to report and/or cooperate, including by withholding material information, may result in disciplinary action, including termination of employment or contractual relationship.

- **Who to report to**

Glochem employees, trainees and consultants should raise a suspected misconduct in the first instance to the Head of their Department or to Vice President Operations at [Whistleblower@Glochেমindia.com](mailto:Whistleblower@Glochেমindia.com)

- **How make a report**

Reports may be made verbally, by email or in hard copy.

Individuals submitting reports of suspected misconduct should submit all pertinent information with regard to the suspected misconduct including any documentary or other evidence. While reports of suspected misconduct may be submitted anonymously, including the name of the individual making the allegation may add to the credibility of the allegation and may facilitate a more effective investigation.

- **What action will Glochem take?**

- The decision whether a review, audit, or other investigation is warranted under the circumstances will be determined on a case-by-case basis by the CMD. Such a decision should be made within 15 days of the receipt of the report of suspected misconduct.
- Glochem may contact the individual who made the report to request additional information that may be required for any investigation.
- Please note that for privacy reasons, Glochem will not provide the whistleblower with information relating to the steps taken by Glochem or any outcomes resulting from the disclosure and subsequent investigations.
- To ensure accountability of appropriate actioning of whistle blower reports, a list of reports, follow-up investigations, findings and actions taken over the course of the previous year will be reported confidentially to management team as part of its annual meeting each year.

### **Confidentiality**

As much as possible, Glochem will treat any information provided in a sensitive and confidential way. The identity of the whistleblower will be kept confidential, however, Glochem may disclose this information if required by law.

### **Bad faith conduct**

Making allegations through the Whistleblower and Anti-Retaliation Policy that the individual knows to be false, intentionally, and materially incomplete, or with an intent to misinform will be considered as Misconduct under this policy.

### **Communication**

All current employees, trainees and consultants will be provided a copy of this policy and made aware of their rights and responsibilities contained within it.

Vendor organizations will be informed of this policy through the development of new and existing contracts at renewal.