



THE INDIAN STEEL & WIRE PRODUCTS LIMITED

Ref No- WP/BE/ 016 / 2021-22

Date:28.03.2022

CIRCULAR

Whistle Blower Protection Policy for Business Associates

Preface

As per Tata Code of Conduct (The Code), the Business Associates who have business dealings with a Tata Company, but are not the members of the Tata group, are expected to abide by The Code while dealing with the Tata Company.

ISWPL, (The Company) believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting The Code and expects its Business Associates to display the highest standards of professionalism, honesty, integrity, and ethical behavior. The Company would urge its Business Associates to inform any unethical act being indulged by any employee and other Business Associates during their business dealings with the Company. The Company would like to assure the Business Associates that it would endeavor to protect them within the Company's laid down policies. This policy is in addition to our earlier Whistle Blower Policy for Business Associates.

Definitions

- "Business Associate" means a person/organization involved in supplies of material or services to ISWP or dealing with material and services on behalf of ISWPL and registered in Business Associate Data Base of the company.
- "Whistle Blower" means a Business Associate making a Protected Disclosure under this Policy and thereafter extending whatever assistance required in establishing the facts mentioned in the Disclosure.
- "Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence demand for illegal gratification and/or unethical or improper activity by Company's employee. The Business Associates providing the information shall give their identity and contact details. They shall be considered as a Whistle Blower after the facts mentioned in the Protected Disclosure are established.

Eligibility

All registered Business Associates of the Company are eligible to make Protected Disclosures under the Policy. The Protected Disclosures should be in relation to matters concerning the Company.

Disqualifications

While it will be ensured that Whistle Blowers are accorded protection from unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action. Protection under this Policy would not mean protecting the Whistle Blower from disciplinary action for making false or bogus allegations or for indulging in any unethical act concerning the Company or its employees.

Procedure

Protected Disclosure 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.

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Corporate Identity Number : U27106WB1935PLC008447

A **TATA** Enterprise



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Misconduct concerning the chief Ethics Counsellor and employees at the level of GM and Above , should be addressed to the Ethics Officer & chairperson of the Apex Ethics Committee of the company and those concerning other employees, should be addressed to the chief Ethics Counsellor of the company.

The Whistleblower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosure will not be entertained as it would not be possible to interview the Whistleblowers.

The contact details of the Chairperson of the Apex Ethics Committee and of the Chief Ethics Counsellor of the company are as under:

Ethics Officer & Chairperson of the Apex Ethics Committee:

Mr. Neeraj Kant

The Indian steel and Wire Products Limited, Indranagar, East Singhbhum, Jamshedpur Jharkhand-831004.

Chief Ethics Counsellor, ISWPL

Mr. Chittaranjan Thakur
Indranagar, Jamshedpur – 831004, Jharkhand
E-mail adds: ethics@iswp.co.in

In case a Whistle Blower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to Chairperson of Grievance Committee / Chief Ethics Counsellor, giving details of nature of victimization allegedly suffered by them. The Company would conduct necessary investigation of the concern and recommend appropriate action as per the laid down policy of the Company.

Amendment

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

Notification to this Policy

Chief Procurement Officer shall ensure that the approved copy of this policy and its subsequent amendments if any are notified to all the Business Associates engaged in business with the Company. The policy must be hosted in the company website for information of Business Associates.

Neeraj Kant
Managing Director