

SHRI RATHI STEEL LIMITED

Corporate Off.: A-29, Sector-65, Noida 201301 (INDIA)

Ph: +91 120 4744644

Regd. Office: J-1/202, DDA Flats, Kalkaji, New Delhi -110019

Works: Plot 'E' & C-133 to 152, Phase III, Masuri Gulawati Road
UPSIDC Industrial Area, P.O.: Udayrampur Nagla, Distt. Hapur-201015

Ph :+91-9821199351,52

GSTIN : 09AAACS4554L1Z0 | CIN : U65993DL1992PLC046954

E: career@shrirathigroup.com | www.shrirathigroup.com

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SHRI RATHI STEEL LIMITED

WHISTLE BLOWING POLICY

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1. ABOUT THIS POLICY

- 1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, officers, consultants, contractors, workers and agency workers.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It also includes the following matters specific to this workplace.

3. HOW TO RAISE A CONCERN?

- 3.1 We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Whistle blowing Officer Mr. Gopal Rathi or Mr. Anil Rathi. Contact details are at the end of this policy.
- 3.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

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4. CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. EXTERNAL DISCLOSURES

- 5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 5.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 6.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2 Whistle blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform to Mr. Gopal Rathi, Director of the Company immediately.
- 6.3 You must not threaten or retaliate against whistle blowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 6.4 However, if we conclude that a whistle blower has made false allegations maliciously or with a view to personal gain, the whistle blower may be subject to disciplinary action.

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7. CONTACTS

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|-------------------------------|--|
| Whistleblowing Officer | GOPAL RATHI 0120-4744644 gopalrathi@shrirathigroup.com |
| Managing Director | ANIL RATHI 0120-4744644 anilrathi@shrirathigroup.com |

