

POLICY 23 – WHISTLE BLOWER
KSIPL / HRM / 23/ VERSION 1.0
Revision – 00 Effective – 01/01/2018

PURPOSE

- To enable employees to voice concerns - in a responsible and effective manner.
- To provide a platform to employees to disclose information internally, without fear of reprisal or victimization, where such employee has a reason to believe that the information shows serious malpractice, impropriety, abuse or wrongdoing within the Organization.
- To enable disclosure of information, independently of line management (although in relatively minor instances the immediate Superior would be the appropriate person to be informed).
- To ensure that employee of the Organization feels she/he is not at a disadvantage while raising legitimate concerns.

APPLICABILITY

- This policy is applicable to all regular employees.
- This policy also covers Advisors, In-House Consultants, Whole Time Directors and Employees on contract

WHISTLEBLOWER-MEANING:

Any employee, who finds that any conduct which may inappropriately affect the financials or the image of the company can, without expecting any reward in return blow the whistle i.e. report the matter to the management as per the guidelines given below. Such an employee is known as a „WHISTLE-BLOWER“ and the act of reporting is known as „WHISTLEBLOWING“.

Acts of Wrongdoings as illustrated below may include but not necessarily be limited to:

- a) Forgery or alteration of documents
- b) Unauthorized alteration or manipulation of computer files
- c) Fraudulent financial reporting
- d) Pursuit of a benefit or advantage in violation of the Company's interest
- e) Misappropriation/misuse of Company's resources, like funds, supplies, or other assets
- f) Authorizing/receiving compensation for goods not received / services not performed

- g) Authorizing or receiving compensation for hours not worked
- h) Improper use of authority
- i) Release of Proprietary Information
- j) Kickbacks
- k) Theft of Cash
- l) Theft of Goods/Services
- m) Unauthorized Discounts
- n) Falsification/Destruction of Company Records
- o) Fraudulent Insurance Claims
- p) Harassment, including of sexual nature

EXCLUSIONS-

However, the following matters shall not fall within the ambits of the Whistle-Blowing policy-

- Personal grievances
- Dissatisfaction with appraisals and rewards
- Complaints relating to Service conditions
- Suggestions for improving operational efficiencies
- Company policies

INVESTIGATION

Any Act of wrongdoing will be informed by an employee to Head HR.

All protected disclosures under this policy will be recorded and thoroughly investigated.

The Audit Committee may investigate and may at its discretion consider involving any other Officer of the Company and/ or an outside agency for the purpose of investigation.

The decision to conduct an investigation is by itself not an accusation and is to be treated as a neutral fact finding process.

The investigation shall be completed normally within 90 days of the receipt of the protected disclosure and is extendable by such period as the Audit Committee deems fit.

DECISION AND REPORTING

If an investigation leads the Vigilance and Ethics Officer/Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the Vigilance and Ethics Officer / Chairman of the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as he may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

POLICY 21 – SAFETY AND WORKPLACE SECURITY

КСІРЛ / HRM / 21 / VERSION 1.0
Revision – 00 Effective – 01/01/2018

OBJECTIVE

- To provide employees with clear guidelines on safety and security at workplace.
- To comply with safety standards and to endeavor to maintain a safe and injury free workplace.

SCOPE:

- Applicable to all employees of КСІРЛ.

RESPONSIBILITY

It is the responsibility of every employee to become familiar with the safety and security guidelines and adhere to the same.

Managers are expected to act as role models regarding protection and security at workplace. The HR team shall be responsible for employee safety and ensure availability of all safety equipment.

The designated Safety Officer shall be responsible for employee safety and maintenance of safety equipment at their respective site units.

ACCOUNTABILITY

All Vertical Heads, HODs and Managers shall be accountable for implementation of the policy.

Head HR shall be accountable for monitoring the process and ensuring adherence to the policy.

PROCEDURE**Workplace Security**

Our organization is committed to maintain a safe and secured workplace.

To maintain a secured work environment, the company prohibits employees and visitors from bringing any firearm or weapon into the company's premises.

Biometric Access Control Systems have been installed at all sites and Head Office and only employees and consultants of КСІРЛ have access to the system

If anyone is unable to access the BAC system, they should immediately report to HR Dept. at HO to rectify the issue.

The visitors must be provided with visitor card, which they must wear all the time while in office. All visitors must be allowed entry and exit by security and a host must accompany them at all times.

Never assume that a person should have access to a building just because you have seen him in the building earlier also.

If an unescorted visitor is noticed by any employee, he / she must notify his / her manager or contact the security immediately.

Do not accept suspicious packages (excessive postage, no return address, unusual odour or stains etc.).

At sites, it is the responsibility of Project Managers to ensure that a secured workplace is provided to the employees.

In case of threats, riots, arsons, civil disturbances etc., the Project Manager shall be responsible to ensure that adequate security is provided to the employees.

Failure to comply with the policy shall be considered as a serious act of non-compliance of the norms and shall attract disciplinary action.

Workplace Safety

Safety of employees precedes all other targets. The company is committed to ensure safe and hygienic workplace

All employees are expected to comply with safe work practices.

The Company shall make every effort to keep the office equipment in excellent condition and make sure that all safety devices work properly.