



The Whistle Blower Policy

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Program Title	UltraTech Cement Limited - Whistle Blower Policy
Policy type	Compliance
Category	Country specific policy – Applicable to Indian operations of UltraTech Cement Limited (“the Company”)
Coverage	All Employees, Directors and Third parties who may wish to report a concern related to a potential violation of the Company Code of Conduct
Responsible portfolio & contact information	Organization Effectiveness portfolio at Business Human Resources, UltraTech Cement Limited & utcl-values.sh@adityabirla.com

The Aditya Birla Group Values of Integrity, Commitment, Passion, Seamlessness, and Speed are the foundation for all our actions and for the decisions we take. They set standards for the organization and for employee conduct.

Purpose of this policy

The purpose of this policy is to articulate the Company’s point of view on **whistle blowing**, the process, and the procedure to strengthen the whistle blowing mechanism at the Company.

This policy:

- Provides a platform and mechanism for the Employees and Directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- It provides an environment that promotes responsible and protected whistle blowing. It reminds Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Group Values or the Company’s Code of Conduct.
- Above all, it is a dynamic source of information about what may be going wrong at various levels within the Company, which will help the Company in realigning various processes and to take corrective actions as part of good governance practice.

Coverage of this policy

- This policy is applicable to all the Units/Zones in India, including all employees and Directors.
- This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.

Who is a whistle blower?

Any Employee, Director or third party who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the Company’s Code of Conduct or the Group Values. This whistleblower has come to the decision to make a disclosure or express a genuine concern/grievance/allegation, after a lot of thought.

Protection

The process is designed to offer protection to the whistleblower (employees and directors) provided that the disclosure made / concern raised / allegations made (“complaint”) by a whistleblower is in good faith and the alleged action or non-action, constitutes a genuine and serious breach of what is laid down in the Group Values and/ or the Company’s Code of Conduct.

The Business affirms that it will not allow any whistleblower to be victimized for making any complaint. Any kind of victimization of the whistleblower brought to the notice of the Value Standards Committee will be treated as an act warranting disciplinary action and will be treated so.

As a Company, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against whistleblowers. Complete protection will be given to whistleblowers against any unfair practices like retaliation, threat or intimidation, termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like, including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

Reporting in good faith

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely based on hearsay or rumour. This also means that no action will be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the Value Standards Committee shall take appropriate disciplinary or legal action against the concerned whistleblower.

List of exclusions

The following types of complaints will ordinarily not be considered and taken up:

1. Complaints that are Illegible , if handwritten
2. Complaints that are trivial or frivolous in nature
3. Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
4. Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed
5. Issue raised, relates to service matters or personal grievance (such as increment, promotion, appraisal etc.) or also any customer/product related grievance.

Dealing with anonymity

A whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

Confidentiality

The Value Standards Committee will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important , it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.

Who is a whistle blower officer?

For the purpose of this policy, the whistle blower officer will be Company Secretary at a Business level (or in his/her absence, the Legal Head) and Finance/Commercial Head (or in his/her absence, the Legal Officer) of the relevant Unit would act as the Whistle Blower Officer of the relevant Values Standard Committee.

Procedure for raising a complaint

A whistleblower can make a complaint in multiple ways:

1. Writing to the relevant Value Standards Committee. The information about Value Standards Committee (VSC) at various levels, their e-mail id are available on the Company's intranet www.abgmlink.com or respective unit/zonal HR Team or Business HR OE Team.

2. Sending a complaint to the ethics hotline by calling on a toll free number **1800 103 9868**, or write to abg.whistleblower@ethicshelpline.in, or send a fax on **1800 103 9868** or mail it to **P. O. Box No 71**, DLF Phase 1, Qutab Enclave, Gurgaon – 122002, Haryana. This is operated by an independent third party vendor.
3. Writing to the CHRO or Business Head Or Company Secretary or Unit Head or Secretary of respective VSC, as these officials are duty bound to share the complaint with the Ethics Hotline
4. In exceptional cases the complainant can directly report his / her complaint to the Chairperson of the Company's Audit Committee. Details of the Chairperson are available on the Company's website.

Reporting process

Quarterly report will be placed before the Business Value Standards Committee and also shared with the Organization Effectiveness portfolio at Group Human Resources.

Guidelines for communication and implementation of this policy

An ethics hotline will be made available. This toll free number will be available for reporting of any violation or misconduct. A communication mechanism will be put in place to create awareness about this policy with the existing employees and for new joiners in all units/zones operating in India.

It is the responsibility of the Business Organizational Effectiveness Team to ensure that the updated names and email id of the various Business and Unit level Value Standards Committee is made available to all employees through the local intranet and/or any other communication mechanism they may adopt.

This policy is equally applicable to Third parties who may wish to report a concern related to a potential violation of the Group Values or the Company Code of Conduct.

A detailed Operationalizing Guideline will be made available to each Values Standard Committee to ensure that this policy is implemented in letter and spirit. For any query or clarification on this policy, you may write to the Organization Effectiveness portfolio at utcl-values.sh@adityabirla.com.

Important Templates

Annexure 1 – Template for reporting violations

Annexure 2 – Sample workflow /procedure for reporting, resolving and closing a case

Annexure 1 - Template for Reporting Violation

To: Value Standards Committee <at Business or Unit level>: _____

Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Please note that multiple issues can be selected

- | | |
|--|--------------------------|
| 1. Misappropriation of company assets or resources | <input type="checkbox"/> |
| 2. Conflict of interest | <input type="checkbox"/> |
| 3. Inappropriate sharing of confidential information | <input type="checkbox"/> |
| 4. Financial fraud of any nature | <input type="checkbox"/> |
| 5. Violation of gifts and entertainment guidelines | <input type="checkbox"/> |
| 6. Non-adherence to safety guidelines | <input type="checkbox"/> |
| 7. Inaccurate financial reporting | <input type="checkbox"/> |
| 8. Bribery & Corruption | <input type="checkbox"/> |
| 9. Insider trading including dealing with instances for leak of unpublished price sensitive information. | <input type="checkbox"/> |
| 10. Other forms of Harassment – Victimization, Bullying, Discrimination etc. | <input type="checkbox"/> |
| 11. Social Media Usage | <input type="checkbox"/> |
| 12. Misuse of authority | <input type="checkbox"/> |
| 13. Environment, health and safety | <input type="checkbox"/> |
| 14. Concurrent employment | <input type="checkbox"/> |
| 15. Others _____ | <input type="checkbox"/> |

Please provide name, designation and department of the person(s) involved?

	Name	Department	Designation
Individual 1			
Individual 2			
Individual 3			
Individual 4			

When did the incident occur? (Please provide tentative date if you do not know the exact date)

Please confirm the location of the incident

How did you find out about this incident?

How long has this been occurring for?

- Less than a month
- 1-6 months
- 6-12 months
- Greater than 12 months

Please provide a detailed description of the incident. To enable the Company to act on your complaint, you are requested to provide specific information. Where possible, please include names, location, date, time etc. Please note that this field is limited to 5,000 characters.

Do you have any evidence in support of your allegations?

- Yes
- No

Is anyone else aware of this incident?

- Yes
- No

Is there any additional information that would facilitate the investigation of this matter?

- Yes
- No

Have you reported this incident to anyone in the company?

- Yes
- No

Date:

Location:

Name of the Person reporting (optional):

Contact Information (incl email optional):

The complaint is to be either reported to the relevant Values Standard Committee at Unit, Business or Group level or to be shared at the ethics hotline - either verbally, over a phone, fax or through email.

Annexure 2 - Sample workflow for reporting, resolving and closing a case

