

Whistleblower Policy

1. Preface

BSCPL has been built to today's size and stature based on trust, loyalty, commitment and honesty of its employees attached to the Company for a few decades. Thus far, the Code of Conduct and Ethics are unwritten in the Company; but, a reality in practice and in principle. The role of stakeholders in growing the Company to this standard, including suppliers, sub-contractors, vendors, agencies, consultants, customers, investors, employees and directors, cannot be undermined. Accordingly, this Whistleblower Policy has been formulated with a view to provide a mechanism for the stakeholders to maintain the highest degree of standards for ethical, moral and legal business conduct by eliminating violation of any processes, misrepresentations of any facts and figures etc. through providing opportunity to the stakeholders to report their findings.

2. Objective

With a commitment to maintain highest standards of ethical, moral and legal conduct of business operations, BSCPL encourages its stakeholders who have concern about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. This Policy aims to provide an avenue for its stakeholders to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports etc.

3. Scope

Every stakeholder is eligible to raise his/her/its concern by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. However, such information should be factual and not speculative in nature. This Policy covers malpractices and events which have taken place or suspected to take place involving:

- (a)** Abuse of authority
- (b)** Breach of contract
- (c)** Negligence causing substantial and specific danger to public health and safety
- (d)** Manipulation of company data or records
- (e)** Financial irregularities, including fraud or suspected fraud or deficiencies in internal control and check or deliberate error in preparation of financial statements or misrepresentations of financial reports
- (f)** Any unlawful act whether criminal or civil
- (g)** Pilferage of confidential or proprietary information
- (h)** Deliberate violation of law or any regulation
- (i)** Wastage or misappropriation of company funds or assets
- (j)** Breach of company policy or failure to implement or comply with any approved company policy.

BSCPL Infrastructure Limited

4. Policy on Good Faith basis

- (a) A complainant must act in good faith and have reasonable grounds for forming a belief that his or her complaint constitutes a violation
- (b) This Policy should not be used for raising malicious or unfounded allegations against colleagues, superiors or subordinates or against any employee by outside stakeholders
- (c) Any stakeholder who is found to be making baseless, reckless, malicious or deliberately false allegation, shall be subject to disciplinary proceedings, which may extend to termination of employment or imposing monetary penalties.

5. Protection to Complainant

The Management is committed to encourage every stakeholder to report bonafide concerns and to protect the complainant against any kind of harassment. The Complainant is free to report and seek protection from any such kind of retaliation or harassment

6. Reporting and Process Mechanism

- (a) Implementation of the Policy will be under direct supervision of the Audit Committee
- (b) The Process Owner of
- (c) The concerned stakeholder has to completely disclose his identity and address and send his findings in writing addressed to the Chairman of the Audit Committee with copy to the Chairman and Head HR. Emails can also be sent to the dedicated mail id: whistleblower@bscpl.net . **Unanimous letters will not be entertained.**
- (d) The Complainant should provide as much information as possible about the suspected violation describing:
 - (i) The nature, period of commission and details of alleged violation
 - (ii) The identity of the persons suspected to have committed the alleged violation
 - (iii) Description of documents that would describe or prove or relate to the suspected violation
 - (iv) The Complaint should be lodged within 30 days of the date of violation in order to take an appropriate corrective action.
- (e) Except in case where the complaint is by or against a HoD, the Head HR, in consultation with the Chairman shall, on being satisfied about the genuineness of the complaint, initiate the process of investigation on the subject matter of complaint. Complaint by or against a HoD shall be directly addressed to the Audit Committee and the course of action shall be as decided by the Committee.
 - (i) All employees have to cooperate in an investigation
 - (ii) The identity of the complainant and the information disclosed will be kept confidential, except where it is compulsory to be disclosed
 - (iii) The report of the investigation will be submitted to the Audit Committee
 - (iv) The Committee shall conduct an enquiry on the report and shall recommend a disciplinary action against the violators, including termination of services, and also modification in the systems and procedures to avoid recurrence of such lapse.