



## Whistle Blower Policy

### Purpose

At Springworks, we are committed to working with the highest integrity and ethics while running the business. This policy aims to articulate our firm commitment to any unlawful practices. We believe in transparency and accountability, and we encourage our employees to speak up if they witness any misconduct or violation of company policies or applicable laws. We have developed a Whistleblower Policy to provide a secure and confidential mechanism for employees to report such incidents. The purpose of this policy is to encourage and enable employees to raise genuine concerns, report any wrongdoing, and protect them from retaliation. This policy applies to all employees, including contract workers, consultants, and vendors, and it is designed to facilitate the reporting and investigation of any concerns raised in good faith. By implementing this policy, we aim to create a culture of openness and accountability, where employees can feel safe and empowered to speak up without fear of adverse consequences.

### Who is a whistleblower?

A whistleblower is an individual who reports illegal or unethical behavior, practices, or actions within an organization, either internally or to an external authority. Whistleblowers play a crucial role in helping to identify and prevent wrongdoing in the workplace, protect the interests of stakeholders, and promote transparency and accountability within organizations. It takes courage for a whistleblower to come forward, often at great personal risk, and it is essential for organizations to have policies and procedures in place to protect and support them.

### How can I report any undoing activities?

You can reach out to the HR team with specific evidence to support your claim. You can also reach out to the team if you feel that an inquiry is required or if you have some information on any person breaking the code of conduct, or ethical practices.



## What can be reported?

Whistleblowers can report any activity or behavior they believe violates company policy or is illegal, unethical, or fraudulent. This can include but is not limited to, discrimination, harassment, safety violations, environmental violations, financial misconduct, and violations of laws and regulations. The policy will provide specific examples of what can be reported and how to report such incidents. It is important to note that the company encourages whistleblowers to report concerns internally before seeking external options.

## Protection to the Whistleblower

This policy is designed to protect the anonymity of the whistleblower. The Company 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.

As a Company, we condemn any kind of discrimination, harassment, victimization, or any other unfair employment practice adopted against the whistleblowers. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or 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.

In an event where the whistleblower is threatened by any other person in any form written or verbal, such instances should be brought to the attention of the People Officer and the CEO. If found in the wrong appropriate disciplinary actions will be taken will may or may not lead to the termination.

## Report in good faith

It is important to understand that this policy is not intended to encourage employees to make frivolous or malicious allegations, or for personal gain. Any reports made under this policy must be done in good faith, meaning that the employee making the report genuinely believes that the information being reported is true and accurate.



The company will not tolerate any retaliatory action taken against an employee who makes a report in good faith, even if the investigation finds that the allegations were unsubstantiated. However, the company reserves the right to take disciplinary action against an employee who makes a false report maliciously or with the intent to cause harm to another employee or the company.

Employees should also be aware that making a report in good faith does not absolve them of their responsibility to follow company policies and procedures, or of any legal obligations they may have.

## List of exclusions

Here is a list of exclusions that are not covered by the whistle-blower policy:

1. **Personal grievances:** This policy is not intended to address personal grievances or disputes. It should not be used as a means to settle personal scores or to address issues that are not related to any illegality or unethical behavior.
2. **Trivial matters:** The policy is not intended to address trivial matters or minor disagreements between employees. It should only be used to report serious concerns that have a significant impact on the organization or its stakeholders.
3. **Matters already addressed:** If an issue has already been investigated or addressed by the appropriate authorities or management, it should not be reported again under this policy.
4. **Matters beyond control:** The policy does not cover matters that are beyond the control of the organization, such as changes in the economic or political environment.
5. **Matters covered by other policies:** If an issue is covered by other policies or procedures of the organization, it should be reported under those policies instead of the whistle-blower policy.
6. **Matters that are already in court or have been previously investigated by an external agency will be excluded from this policy.**

It is important to note that this list is not exhaustive and may be amended or modified at any time. Employees are encouraged to seek guidance from the designated authority in case of any doubt or uncertainty.



## Whistleblower officer

The Whistleblower Officer is a designated individual responsible for receiving, documenting, and investigating complaints made under this policy. The Officer shall be an unbiased individual appointed by the management and may include a senior executive or a member of the Human Resources department. The Officer shall be responsible for protecting the identity of the whistleblower and ensuring that no retaliatory action is taken against the whistleblower.

The Whistleblower Officer's responsibilities shall include but not be limited to:

1. Receiving complaints made by whistleblowers.
2. Conducting a preliminary review of the complaint to determine whether it is within the purview of this policy.
3. Ensuring the confidentiality of the whistleblower's identity.
4. Promptly acknowledging receipt of the complaint and initiating an investigation within a reasonable time frame.
5. Investigating the complaint, gathering relevant facts and evidence, and interviewing relevant parties, including the whistleblower.
6. Reporting the findings of the investigation to the management and recommending appropriate remedial action.
7. Ensuring that no retaliatory action is taken against the whistleblower.
8. Maintaining records of all complaints received and investigations conducted under this policy.
9. Monitoring the effectiveness of this policy and recommending changes as necessary to improve its effectiveness.

The Whistleblower Officer shall be accountable to the management and shall report to them on a regular basis regarding complaints received and investigated under this policy.