

# WHISTLE BLOWER POLICY

## REVENT PRECISION ENGINEERING LIMITED

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## 1. INTRODUCTION

Revent Precision Engineering Limited (“the Company”) is dedicated to conducting its operations with fairness, transparency, and adherence to the highest standards of professionalism, honesty, integrity, and ethical conduct. The Company is committed to fostering a culture where employees feel safe and empowered to raise concerns regarding unacceptable practices or misconduct.

To support this commitment, the Company has established a vigil mechanism known as the “Whistle Blower Policy.”

The objective of this policy is to:

- Provide a secure platform for employees to report unethical behaviour, suspected fraud, or violations of the Company’s policies.
- Encourage responsible whistle-blowing while ensuring adequate safeguards against retaliation or victimization of those who raise concerns in good faith.

This policy is not intended to be used for raising malicious or baseless allegations driven by personal grievances.

## 2. SCOPE

I. The Whistleblower Policy / Vigil Mechanism is designed to address genuine and significant concerns that could have a substantial impact on the Company. It covers actions (actual or suspected) that:

- a) May result in inaccurate financial reporting.
- b) Violate applicable policies or the Company’s Code of Conduct.
- c) Involve unethical behavior.
- d) Constitute actual or suspected fraud.
- e) Are unlawful.
- f) Represent serious improper conduct.

### II. Examples of Restricted Practices:

The following are illustrative examples of practices that are restricted under this policy:

- Engage in business, relationship or any activity with a vendor/third party of Revent
- Engage in any business, accept employment or a position of responsibility outside Revent
- Sharing of company confidential information outside the organization
- Accept/Provide any gifts to third parties, vendors etc. beyond the limits specified in the gift policy
- Submit incorrect/falsified/forget supporting documents for expense claims
- Engage in beyond professional relationships/close relationships with another employee, which may lead to a conflict of interest

### III. Policy Limitations:

This policy should not be misused as a substitute for the Company’s grievance procedures. It is not intended to serve as a channel for raising malicious or unfounded allegations against colleagues.

## 3. ELIGIBILITY

This Policy is applicable to the Company and all its direct and indirect subsidiaries and covers all their employees and directors whether working in India or elsewhere. The Policy also extends to all consultants, vendors, suppliers, dealers, customers, and contractors working for and/ or on behalf of any of the Group entities. There are no exclusions of this Policy.

#### 4. DISQUALIFICATIONS

1. While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant Disciplinary action.
2. Protection under this Policy would not mean protection from Disciplinary action arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus or with a mala fide intention.
3. Whistleblowers, who make three or more Protected Disclosures, which have been subsequently found to be mala fide, frivolous, baseless, malicious, or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy. In respect of such Whistleblowers, the Company/CEO would reserve its right to take/recommend appropriate Disciplinary action.

#### 5. DEFINITIONS

The definitions of some of key terms used in the Policy are given below.

- a) **“CEO”** means the Chief Executive Officer.
- b) **“Disciplinary action”** means an action that can be taken on completion of/ during investigation proceedings but not limited to a warning, imposition of fine, suspension/ termination from official duties or any such action as is deemed to be fit considering the seriousness of the matter.
- c) **“Employee”** means any employee or director of the company (whether working in India or abroad) and includes contractual employees, apprentices, interns and trainees.
- d) **“Compliance Officer”** for the purpose of this policy, shall be the Compliance Officer of the Company.
- e) **“Ethics Committee”** means a committee formed to act as an Ombudsman to investigate the concerns raised by Whistle Blower(s). The Composition of the Ethics Committee is to be decided (including changes, if any from time to time), by the CEO/Authorized person. The Ethics Committee on the date of coming into force of this policy shall be the Committee comprising of the Members as per Annexure-A to this policy.
- f) **“Investigators”** means persons authorized, appointed, consulted or approached by the Ethics Committee.
- g) **“Protected Disclosure”** means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity within the Company. Protected Disclosure should be factual and not speculative in nature.
- h) **“Subject”** means a person against whom or in relation to whom a Protected Disclosure is made.
- i) **“Whistle Blower”** means an employee, or any person associated with Revent Precision Engineering Limited making a Protected Disclosure in terms of this policy.

## 6. GUIDING PRINCIPLES

To ensure that this policy is adhered to and to assure that the concern will be acted upon seriously, the Company will:

- a. Ensure that the Whistle Blower and/or any individual sharing any evidence or information against Subject is not victimized for doing so.
- b. Treat victimization as a serious matter, including initiating appropriate action on such person/s.
- c. Ensure complete confidentiality.
- d. Not attempt to conceal evidence of the Protected Disclosure.
- e. Take appropriate action, if anyone destroys or conceals evidence of the Protected Disclosure made/ to be made.
- f. Provide an opportunity of being heard to the person involved especially to the Subject.

## 7. PROCEDURE

1. All Protected Disclosures under this policy, should be addressed to the Compliance officer of the Company through following modes: -
  - a. Email: - [whistleblower@reventengineering.com](mailto:whistleblower@reventengineering.com)
  - b. Ethics helpline number: - +91-8484869002
  - c. Address for physical complaints: - 1<sup>st</sup> Floor, Tower A, Tata Intellion Edge, Sector-72, Distt Gurugram, Haryana-122101, India
2. If the Protected Disclosure is against Compliance Officer/ Ethics Committee, then Protected Disclosure should be addressed to CEO.
3. If a Protected Disclosure is received by any executive of the Company other than Compliance officer, the same should be forwarded to the Compliance officer for further appropriate action. It will be the responsibility of the executive to ensure appropriate care has been taken to keep the identity of the Whistleblower confidential.
4. Protected Disclosure should either be typed or written in legible handwriting in English, Hindi or Regional language of the place of employment of the Whistle Blower and should provide a clear understanding of the Improper Activity involved or issue / concern raised.
5. Protected Disclosures should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to assist for proper assessment of the nature and extent of the wrongdoing and should help in investigation.
6. Anonymous or pseudonymous Protected Disclosure shall not be entertained.

## 8. INVESTIGATION

1. The Compliance officer shall prepare a report based on the information provided by the Whistle Blower and will share the same with the Ethics Committee within 3 business days of receiving the protected disclosure.
2. Ethics Committee shall review each Protected Disclosure received under this policy. Ethics Committee shall have the right to dismiss a complaint on the basis of the type of complaint, quality and accuracy of the preliminary evidence provided or any other valid factor(s) in view of the Ethics Committee.



3. Ethics Committee shall thoroughly investigate/ oversee the investigation. The Ethics Committee may at his sole discretion, consider the involvement of any external Investigators for the purpose of investigation and appoint the same.
4. The decision to conduct an investigation is to be treated as a neutral fact-finding process. The outcome of the investigation may or may not support the conclusion of the Whistle Blower that an improper or unethical act was committed. However, the role of Whistle Blower is limited to providing reliable information, they are not expected to act as investigators or finders of facts, nor can they determine the appropriate corrective or remedial action that may be warranted in a given case
5. The identity of a Subject will be kept confidential to the extent possible given legitimate requirements of law and the investigation.
6. Subject shall duly co-operate with the Ethics Committee or any of the Investigators during investigation to the extent that such co-operation will not compromise self-incrimination protections available under the applicable laws.
7. To the extent possible, the Whistle Blower will be informed of the progress of the investigation and, if appropriate, of the final outcome. If the Whistle Blower is not satisfied that the concern raised is being properly dealt with by the Ethics Committee, he/she has the right to raise it to the CEO of the Company through the Compliance Officer. However, where a Whistle Blower makes an appeal to the CEO of the Company, it will be mandatory for the Whistle Blowers to disclose their identity and provide their contact information and proper and verifiable evidence/data must be supported with the appeal. Additionally, Whistle Blower should not make an attempt to participate in the investigation process, unless requested by the Ethics Committee or the Compliance Officer.
8. Subject has a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed, or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the Subject. If he/she is found indulging in any such actions, it will make him/her liable for appropriate actions.
9. Under no circumstances should Subject compel the Ethics Committee/ Compliance officer or the Investigators to disclose the identity of the Whistle Blower.
10. Unless there are compelling reasons not to do so, Subject will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.
11. Subject has a right to be informed of the outcome of the investigation.
12. In the event Compliance officer or any member of Ethics Committee is the Subject, he/she will not be part of the investigation of the case in question.

## 9. PROTECTION

1. Whistleblowers will be fully protected from any form of unfair treatment, including retaliation, threats, intimidation, termination or suspension of employment, disciplinary action, transfer, demotion, denial of promotion, or any other adverse actions. This protection extends to preventing any direct or indirect abuse of authority aimed at hindering the Whistleblower's ability to perform their duties or to make further Protected Disclosures.
2. The Company will take steps to minimize difficulties, which the Whistleblower may experience as a result of making the Protected Disclosure. Thus, if the Whistleblower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistleblower to receive advice about the procedure, etc.
3. A whistleblower may report any violation of the above clause directly to the CEO of the company. The CEO will thoroughly investigate the matter and take appropriate action based on the findings.
4. The identity of the Whistleblower shall be kept confidential to the extent possible and permitted under law. Whistleblowers are cautioned that their identity may become known for reasons outside the control of the Ethics Committee/ Compliance officer (e.g., during investigations carried out by Investigators).
5. Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistleblower.

## 10. INVESTIGATORS

1. Investigators are required to conduct a process towards fact-finding and analysis. Investigators shall derive their authority and access rights from the Ethics Committee/ Compliance officer when acting within the course and scope of their investigation.
2. All Investigators shall be independent and unbiased both in fact and as perceived. Investigators have a duty of fairness, objectivity, thoroughness, ethical behavior, and observance of legal and professional standards.
3. Investigations will be launched only after a preliminary review which establishes that:
  - a. The alleged act constitutes improper or unethical activity or conduct, and
  - b. Either the allegation is supported by information specific enough to be investigated or matters that do not meet this standard may be worthy of management review, but investigation itself should not be undertaken as an investigation of an improper or unethical activity.

## 11. OUTCOME OF INVESTIGATION

1. Based on thorough examination of findings, the Ethics Committee concludes that an improper or unethical act has been committed, then the Ethics Committee shall recommend to the management of the company to take such disciplinary or corrective action as the Ethics Committee deems fit.
2. The decision/ action taken by management shall be final.
3. If the Ethics Committee is satisfied that the Protected Disclosure/ complaint is false or motivated or, then the Ethics Committee may report the matter to concerned Disciplinary Authority for appropriate action against the Whistle Blower.

## 12. REPORTING

The Ethics Committee shall submit a report to the CEO on a quarterly basis about all Protected Disclosures referred to them since the last report together with the results of investigations, if any.

## 13. RETENTION PERIOD

All Protected Disclosures in writing or documented along with the results of the investigation relating thereto shall be retained by the Company for a minimum period of seven years from the date of receipt.

## 14. AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the employees and directors unless the same is notified to the employees and directors in writing.

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**Prakash Hari Khose**  
MD & CEO

Date: 14/10/2024

Annexure A - Composition of the Ethics Committee

The Ethics Committee of Revent Precision Engineering Limited Compromises of the following members:

<u>Internal Ethics Committee-Revent Precision Engineering Limited</u>			
S. No.	Name	Role	Designation
1.	Sanjeeb Mahapatra	Ethics Officer	Company Secretary
2	Muneesh Chawla	Member	Group Financial Controller
3.	Yogesh Singhal	Member	CFO
4.	Ravi Shankar Singh	Member	Chief Human Resource Officer

**For Revent Precision Engineering Limited**



**Authorized Signatory**