



V.V. Titanium Pigments Pvt. Ltd.,
A-81, Sipcot Industrial Complex,
South Veerapandiapuram PO,
Thoothukudi – 628002, Tamil Nadu, India

WHISTLEBLOWER POLICY

1.0 PREFACE

V.V. Titanium Pigments Private Limited (VVTi) has adopted the code of Business Conduct and Ethics which lays down the principles and standards that should govern the actions of the company and its employees. Any actual or potential violation of the code, howsoever insignificant or perceived as such would be a matter of serious concern for the company. The role of the employees in pointing out such violations of the Code cannot be undermined. Accordingly, the Whistleblower Policy has been formulated with a view to provide a mechanism for the responsible individuals to raise concerns on any unethical behaviour, suspected fraud or irregularity in the Company practice, any violations of legal or regulatory requirements etc., without any fear or threat of being victimised.

2.0 DEFINITIONS

- a) **“Company”** refers to ‘V.V. Titanium Pigments Private Limited’.
- b) **“Protected Disclosure”** means a concern raised by a whistle blower through defined channels of reporting in good faith that discloses or demonstrates information about an unethical conduct.
- c) **“Whistleblower”** means the Director, Employees, Customers, Vendors, Suppliers or any other Stakeholders associated with the Company who makes a Protected Disclosure under this policy.
- d) **“Disciplinary Action”** means any action that can be taken upon completion of or during the course of investigation including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit by the Company management considering the seriousness of the matter.

3.0 APPLICABILITY OF THE POLICY

The Whistleblower policy is applicable to the Directors, Employees, Customers, Vendors, Suppliers and other Stakeholders of the Company.

4.0 SCOPE OF THE POLICY

The issues which are covered under the scope of this policy are:

- a) Misappropriation of company assets or resources
- b) Conflict of interest
- c) Mishandling of confidential information
- d) Procurement fraud
- e) Acceptance of gifts and entertainment
- f) Incorrect financial reporting
- g) Sexual harassment
- h) Bribery and corruption

- i) Insider trading
- j) Tax fraud
- k) Harassment of any nature
- l) Victimization or bullying
- m) Discrimination
- n) Misuse of authority
- o) Violation of environment, health and safety guidelines
- p) Concurrent employment.

5.0 PROCEDURE FOR REPORTING DISCLOSURES

- a) The whistleblower can make a protected disclosure under this policy by:
 - i) Sending an e-mail to hr@vvtitanium.in
 - ii) Posting a letter to:
The General Manager,
V.V. Titanium Pigments Pvt. Ltd.,
A-81, Sipcot Industrial Complex,
South Veerapandiapuram PO,
Thoothukudi – 628002, Tamil Nadu, India
- b) The Directors and Employees can make the protected disclosure by keeping their identity anonymous and put it into suggestion box kept near ASO Room. However disclosing the identity will be mandatory for Customers, Vendors, Suppliers and other Stakeholders of the Company.

6.0 PROTECTION TO THE WHISTLEBLOWER

- a) The Company Management shall be responsible to safeguard the whistleblower from any adverse action which includes discrimination, victimization, retaliation, demotion or adoption of any unfair employment practices.
- b) An individual serving as witness or providing assistance in the investigation of a protected disclosure shall also be protected to the same extent as the whistleblower.
- c) Protection under this policy shall not mean protection from disciplinary action arising out of false allegations made by a whistleblower.
- d) A whistleblower may not be granted protection under this policy if he/she is subject of a similar or separate complaint or allegations related to any misconduct. The company will exercise its discretion in case a complainant is found to also be a perpetrator during the course of any investigation.

7.0 PROCEDURE FOR DEALING WITH DISCLOSURES

- a) Upon receipt of a concern, an initial enquiry will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may also be resolved by an agreed action without the need for investigation.
- b) After the concern has been evaluated, the Company will write to the complainant:
 - i) acknowledging that the concern has been received;
 - ii) indicating how it is proposed to be dealt with;
 - iii) informing whether further investigations will take place, and if not, why not.

c) The amount of contact between the body considering the issues and the complainant will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the complainant.

d) The Company will take steps to protect the whistle blower from victimisation and minimise any difficulties which a person reporting under whistle blowing may experience as a result of raising a concern.

e) The Company accepts and would take such steps as may be required to assure the whistleblower that the matter has been appropriately addressed.

