



Globus Spirits Limited

WHISTLE BLOWER POLICY

1. Preface

Globus Spirits Limited is committed towards fair, transparent and ethically correct way of working. Any deviation from the Code of Conduct or any act which in general violates the ideology of the company should always be brought into the notice of the **management/Audit Committee** of the company. To streamline the process of reporting, this Whistle Blowing Policy has been conceived.

This Whistle Blowing Policy also explains the rights and protection provided to the Whistle Blowers by the company.

2. Purpose

At Globus Spirits Limited, we encourage zero tolerance to any kind of unethical conduct at all levels of the company. In pursuance of this a mechanism for bringing into the notice of **management/Audit Committee** such an incident, if any by any employee or any person associated with the company is being made into force.

Our Company recognizes the need to protect the whistle blower from harassment hence provisions for their protection have been taken care of.

3. Applicability

This Whistle Blower Policy is applicable to all the Board members and other permanent employees of the company.

4. Scope

The Whistle Blower Policy enumerates following conducts as unethical and wrongful and will be treated as per the provisions of this code:-

- (i) Disclosure of any confidential information or data of the company.
- (ii) Unauthorized manipulation of any information or data of the company in any possible manner.
- (iii) Unauthorized access or usage of company's assets or data.
- (iv) Wastage of company's resources or assets.
- (v) Activities which constitute fraud or violation of company's Code of Conduct.
- (vi) Any activity which may negatively affect the image or brands of the company in public.
- (vii) Any activity which may adversely affect the Company in any manner whatsoever.

The above list is not exhaustive. The Board of Directors may include any other conduct in it.

5. Procedure for Whistle Blowing

Any person to whom the policy is applicable if detects any matter falling within the purview of this policy shall bring it under the notice of the **Management/Audit Committee**. Such a person shall be entitled to have direct access to the **Management/Audit Committee** to bring it to their notice.

Disclosure may be done by way of **notice/complain** through mail or any other means by the person.

The **Company** shall ensure that there exist enough means by way of which any Whistle Blower may have access to the **Management/Audit Committee**.



6. Confidentiality

It is the duty of the Management/Audit Committee to ensure the confidentiality of the whistle Blower. To maintain the confidentiality of the person making the complaint or notice shall be referred as 'Whistle Blower' and name of such a person shall not be disclosed at least at any time before the enquiry is complete.

7. Investigation

The Management/Audit Committee should immediately conduct investigation on receiving any complaint or notice from any Whistle Blower. The Management/Audit Committee may also suo motu conduct inquiry in matter where it suspects possible fraud.

Depending upon the facts of the matter the Management/Audit Committee may engage an outside agency where investigation requires professional expertise.

The Management/Audit Committee shall submit the Investigation Report to the Board of Directors and shall ensure its secrecy from any other person before submitting it to the Board.

8. Punitive Actions

The Board of Directors on receiving the Investigation Report shall decide on behalf of the company on the recourse to be taken towards the guilty.

Depending upon the nature of the wrong/fraud the Board may either take any disciplinary action or may refer the matter to the police or courts of law.



9. Protection against Retaliation

The Management/Audit Committee is bound to provide protection to the Whistle Blower against any kind of retaliation within the company premises. If the circumstances require so, the Management/Audit Committee is authorized to take any administrative action on behalf of the company to protect the right of the Whistle Blower.

10. False Allegations

At Globus Spirits Limited the matters of false allegations are taken seriously. If the Investigation Report reveals the complaint as false allegation, the Board may take any disciplinary actions including temporary suspension of employment, as it deems fit against the complainant.

If a false allegation turns out to be a result of conspiracy, the complainant and the other persons acting in connivance, if any the Board may decide upon terminating their engagement with the company permanently.

11. Document Retention

Globus Spirits Limited has all the rights reserved to keep all the evidences, proofs, investigation reports and other related documents in its own custody.

The Board may authorize any person to keep such documents in safe custody.

12. Amendment

The Board of Directors of Globus Spirits Limited may review, alter or amend the provisions of the policy at such intervals as they deem fit.



The alteration or amendment shall always be in line with the basic theme of this Whistle Blower Policy.

13. Reporting

Any unethical and improper practices or alleged wrongful conduct may be directly reported to the [Chairman of the Audit Committee](#) or at corpoffice@globusgroup.in.