



TITLE: WHISTLEBLOWER POLICY

PURPOSE

To protect employees against retaliation due to whistle blowing policy. The company is committed for doing business in ethical ways and therefore an employee should raise their concern if they come across any behavior, activity which is suspected to be unethical and dangerous for the company.

SCOPE

This policy shall be applicable to all staff and workers of Spoton Coatings Pvt. Ltd. to maintain disciplinary manner. The scope of whistle blower policy is to define the actions for raising a concern, and the protection provided to the person raising the concern. The set of whistle blowing procedures to be followed by the corporate whistle blower as a concern is raised and the responsibilities of different associates. In all cases company reserves the right whether a case requires investigation or not, if required then how it has to be followed as per the whistle blower policy.

POLICY

- As per the whistle blowing policy and procedure, It is the responsibility of all employees of a company to raise their concern against any unethical behavior or any wrongdoing in the company as laid down in the whistle blowing policy and procedure.
- There should be no retaliation against the person who is whistleblower. Retaliation includes suspension or decrease in salary and legal action by top management.
- The company cannot discriminate against an employee who is helping in the investigation process of any matter related to any public concern.
- Two types of whistle blowing exists in the policy and these are namely internal and external whistle blowing. Internal when concern is raised within the organization and external when concern is raised outside of organization.
- The whistle blowing policy includes concerns raised to prevent loss to the organization and to protect the company from any bad image.
- Fraud, misrepresentation, any kind of theft or abuse of authority, getting hold of confidential Information any kind of discrimination is included under the whistleblower policy.
- Below mentioned list gives some examples of the area where the breach of the code of conduct is observed:
 1. Any kind of Harassment or discrimination
 2. Sharing of confidential information
 3. Any breach of privacy

 4. Any kind of Fraud or Fraudulent
 5. Misrepresentation of financial data
 6. Any kind of illegal activity
 7. Corruption, Invalid promotion
 8. Illegal sales activity
 9. Illegal competitive behaviour
 10. Improper use of company assets



- All complaints received by ombudsperson or the audit committee which is constituted by ombudsperson shall check whether any top management person of the code of conduct has happened or not.
- The person who is a whistleblower may or may not disclose his/her identity. And retaliation includes suspension or decrease in salary and legal action by top management.

Various policies including Supplier Code of Conduct, Employee code of conduct is available in our website for review. External interested parties can contact us directly if found any breach against our policies and also, they can provide their feedback for further improvement at info@spotoncoating.com

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