

Vigil Mechanism/Whistle Blower Policy

Date of Policy Issue: September 1, 2014 Version Number: VM2016-0402/02

1. Employees and Directors are encouraged to raise genuine concerns about any malpractice(s) in the workplace without fear of reprisals and Hawkins will protect them from victimization or dismissal.
 2. Overall authority for the implementation of this policy rests with the Executive Director Finance & Administration under the overall supervision of the Audit Committee of the Board. All Managers have a specific responsibility to facilitate the operation of this policy and to ensure that employees are able to raise concerns, without fear of reprisals, in accordance with the procedure stated herein below. All employees are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.
 3. The term 'malpractice' includes:
 - 3.1. Unethical behaviour;
 - 3.2. Fraud;
 - 3.3. Violation of the Corporate Governance Code of Conduct.
 4. If individuals raise a genuine concern and act in good faith, they will not be at risk of losing their job or suffering any form of retribution under this policy, even if it is later discovered that they are mistaken. This assurance is not extended to individuals who maliciously raise matters they know to be untrue or are involved in the malpractice.
 5. If you believe that the actions of anyone (or a group of people) working for Hawkins do or could constitute malpractice you should raise the matter with your line manager. Where this is not appropriate because the line manager is involved in the alleged malpractice in some way, the matter should be raised with the line manager's manager. You may also raise the matter directly with Internal Audit. If you wish, you may raise the matter with Executive Director – Finance & Administration or the Chairman of the Audit Committee at the following email id: eak@kshirsagar.in.
 6. You must raise your concern in writing and should include all necessary details and, if possible, supporting evidence.
 7. If you have any personal interest in the matter raised, you must disclose this at the outset. This procedure is not meant to replace any grievance procedure, which remains the appropriate way to raise personal issues relating to your specific job or employment.
 8. Your disclosure under this policy will be acknowledged in writing confirming that the matter will be investigated and that Hawkins will get back to you in due course.
 9. A suitable individual or group will be instructed to conduct an investigation into the allegation.
 10. You will receive appropriate written notification of the outcome of the investigation.
 11. If you are not satisfied with the response you have received, you may raise the matter with the Executive Director – Finance & Administration.
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