

Policy Number	HRM/Policy/07	Effective date	09/04/2020
Policy Title	Whistle Blower Policy for Business Associates	Revision No.	00.02
Department	Human Resource Management	Section	Employee Services

1. **SCOPE:** This Policy is in compliance with the Tata Code of Conduct-2015, and in furtherance with Tata Steel Long Products Limited' s ("Company") policy to encourage and protect genuine Whistleblowing by Business Associates, a Business Associates' Whistleblowing Protection Policy ("Policy") has been developed.
2. **OBJECTIVE:** The policy has been prepared to encourage all persons / organisations registered in the Vendor or Customer data base of the company to disclose information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature, by any Employee, Director or Business Associate
3. **DEFINITIONS:** "Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith and which discloses information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature, by any Employee, Director or Business Associate.

"Business Associate Whistleblower" means a person/organization registered in the Vendor or Customer data base of the Company, making a Protected Disclosure and thereafter extending whatever assistance may be required in establishing facts mentioned in the Protected Disclosure.

#### 4. **PROCEDURE:**

4.1. Protected Disclosures should preferably be reported in writing i.e. in ink or electronically, and should be factual (not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower.

Misconduct concerning the Ethics Counsellor and employees at the levels of Sr. General Managers and above, should be addressed to the Chairman of the Audit Committee of the Company and those concerning other employees, should be addressed to the Ethics Counsellor of the Company.

The Whistleblower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistleblowers.

4.2. The contact details of the Chairperson of the Audit Committee and of the Ethics Counsellor of the Company are as under:

Chairperson of the Audit Committee:

Mr. Srikumar Menon, 21/N, Block-A, Flat – 3A, Ground Floor, New Alipore, Kolkata-700053

E-mail: [menonsk01@gmail.com](mailto:menonsk01@gmail.com)

Ethics Counsellor:

Mr. R K Manchanda, Ethics Counsellor, Tata Steel Long Products Limited, Joda-758034

E-mail: [rkmanchanda@tatasteellp.com](mailto:rkmanchanda@tatasteellp.com)

#### 4.3. Third Party Communication Channels for Whistle Blowing:

4.3.1. Toll free number- [1800 1020875](tel:18001020875)(no access code is required)

4.3.2. Web portal- [www.in.kpmg.com/ethicshelpline/tslindia](http://www.in.kpmg.com/ethicshelpline/tslindia)

4.3.3. Email- [tatasteel@ethicshelpline.co.in](mailto:tatasteel@ethicshelpline.co.in)

4.3.4. Post Box - P.O. Box No 71, DLF Phase 1, Qutub Enclave, Gurgaon -122002, Haryana, India

#### 4.4. Protection to the Business Associate Whistleblower:

The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Business Associate Whistleblowers while conducting business with the Company.

The Business Associate Whistleblower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/ orders, refusal from issuance of 'RFQ (Request for Quotation)' to them, or any direct or indirect use of authority to obstruct the Business Associate Whistleblower from continuing to execute their jobs, including making further Protected Disclosures.

Should, in spite of best efforts by the Company, the identity of the Business Associate Whistleblower becomes known during the investigation, the Chief/ Head of the concerned user departments, shall ensure that the Business Associate Whistleblower, is provided with all the assistance required to execute existing orders. Under no circumstances, subjects against whom the disclosures have been made should compel investigator to disclose the identity of the Business Associate Whistleblower.

#### 4.5. Disqualifications:

Any abuse of this protection by Business Associates will warrant disciplinary action.

#### 4.6. Business Associate Whistle Blower Protection:

The Company has constituted the Whistle Blower Protection Committee, In case a Business Associate Whistleblower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the Ethics Counsellor giving specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Whistle Blower Protection Committee. The Whistle Blower Protection Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

4.7. 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.

4.8. Notification to this Policy:

Ethics Counsellor shall ensure that an approved copy of this Policy and its subsequent amendments, if any, are hosted on the Tata Steel Long Products Limited website for information of all Business Associates.

**Revision History**

Rev. No.	Rev. Date	Key Change (mention Sl. No.)	Approved by	Next Review Date
00.01	01-04-2020	Changes in Third Party details (4.3)	CPO	01-04-2021
00.02	15-04-2021	Name & Address change of Chairperson of the Audit Committee (4.2)	CPO	01-04-2022

Prepared & Maintained By:	Recommended By:	Approved By:
R K Manchanda	Mukesh Agarwal	Ashish Anupam
Chief Ethics Counsellor	Chief People Officer	Managing Director
		