



Centena Whistleblower Policy

Definitions:

1. **Whistleblower Policy:** The approach adopted by Centena Group of companies in receiving reports of violations, unethical issues, and fraud and its approach to protect the whistleblower.
2. **Whistleblower:** A person who reports fraud or other unethical issues within Centena Group, as well as among stakeholders and entities that are engaged in business with Centena Group, including without limitation to, all customers, partners, suppliers, the community (public), and the agents of third parties and their representatives.
3. **Whistleblowing:** A process adopted for reporting any violations, fraud, unethical issues within Centena Group.
4. **Violation:** Malpractices, including any criminal or financial violations, breach of any legal or regulatory obligations, internal organisational requirements or any acts that pose a threat to health, safety or environment.
5. **Fraud:** An unethical, irregular or illegal act or practice characterized by dishonesty and the premeditated intention to conceal a fact, either in words, acts or counterfeiting, which would result in financial or non-financial loss to Centena Group. It includes erroneous accounting practices or false financial reporting with fraud and mala fide intention.
6. **Integrity:** Treating everyone fairly and without discrimination or bias and acting professionally and objectively in public affairs management and in relationship with others.
7. **Unethical issues:** Defaming any person by gender, caste, creed or color both verbal or written, or touting to gain undue advantage or bribing or getting illegal enrichment.

Purpose of the policy:

Centena Group is committed to develop an integrated framework for whistleblower's protection. The main objective of this policy is to ensure that no (staff or customer) sustains any potential damage, in present or future, and protect them from any harm as a result of reporting any violations, fraud, or unethical issues.

Scope of the policy:

This policy applies to Centena Group and its divisions, departments, employees and customers.

Whistleblower Protection:

Centena Group is committed to ensuring the protection of whistleblower's who are covered by Centena Group Whistleblowing Policy through the detection of violations, ensuring full confidentiality and dealing



with the report covered by this policy based on specific and credible information or documents, without violation of any ethical rules recognized by Centena Group. A whistleblower will have following protection:

- a) Necessary protection at the location of the work and ensure that the employee does not suffer any discrimination and/or mistreatment.
- b) Non-disclosure of information concerning the employee's identity and whereabouts.
- c) No whistleblower will be considered to have violated the provisions of the legislation, agreements and representations related to disclosure of confidential information, whether in the entity for which the whistleblower works or deals with, unless the report is proved false.
- d) Revenge, harassment or persecution by other employees
- e) Bias against the whistleblower from Staff, Customer- (Internally or externally) in the present or the future

Confidentiality: All data and information provided by the Whistleblower will be confidential. Centena group will not disclose the information received from a whistle blower to any other party unless required to do so by a court of law.

Procedure: The link is available on the CGNet and the Centena websites, which can be used by the whistleblower to lodge a complaint. The Whistleblower has to lodge the complaint and list out in his complaint all relevant proofs or evidences within one (1) year of when it came to his/her knowledge. He/she will have to produce the evidences and proofs as and when asked by the investigating committee during the investigation of the case. If such complaint is lodged after the specified time frame then, based on situation and circumstances and the gravity of the matter, CMD reserves the right to still consider the acceptance of the complaint. All such complaints shall be viewable only by the HR Manager and the CMD of Centena. Upon receiving any information on any act, which falls within the scope of whistleblowing, the HR Manager shall form a special committee to investigate the facts of the damage. The members of the Committee will include the Head of Audit & Risk, Legal and HR Department or any other Department Head as nominated by the CMD and they will submit an enquiry report to the CMD within 15 days after constitution of the committee.

The CMD can at his/her discretion take appropriate action against employees who misuse this link to deliberately lodge false complaints against other persons.

Effective Date of Policy: This policy is implemented w.e.f. 1stJAN2019 and will be periodically reviewed every three years or earlier if necessary.

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