

COMPLAINT RESPONSE PLAN POLICY

(FOR WHISTLE BLOWER POLICY)

J.B. CHEMICALS & PHARMACEUTICALS LIMITED

Registered office: Neelam Centre, B Wing, 4th Floor,

Hind Cycle Road, Worli,

Mumbai – 400 030



Version control

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Board of directors	Nikhil Chopra	Chief Executive Officer & Whole-time director	<i>Chopra</i>



Definitions:

Definition	Explanation
Alleged Wrongful Conduct	Actual or suspected fraud, violation or infringement or potential violation of the company's Code of Conduct, laws and regulations, Anti-Bribery and Anti-Corruption policy, irregularities, governance weaknesses, financial reporting issues, mismanagement, misappropriation of the Company's assets, monies, and/or abuse of authority or any other act having/potential of having similar effect/outcome and illegal or unethical practice including instances of leak of unpublished price sensitive information.
Audit Committee	A committee constituted by the Board of Directors pursuant to section 177 of the Companies Act, 2013.
Board	The board of directors of the Company.
Bona Fide	Reporting of a Protected Disclosure based on a reasonable inference of unethical or improper practices or any other Alleged Wrongful Conduct.
Bribes	Offering, giving or promising, accepting or soliciting a financial advantage or something of value (or authorizing someone to offer, give, or promise or accept or solicit) in exchange for an act which is dishonest, illegal, and improper or a breach of trust, designed to influence the recipient in the exercise of their duty and to incline them to act contrary to accepted standards of honesty and integrity, to avail improper business advantage.
Bribery	An act of offering, giving or promising, accepting or soliciting a financial advantage or something of value (or authorizing someone to offer, give, or promise or accept or solicit) in exchange for an act which is dishonest, illegal, and improper or a breach of trust, designed to influence the recipient in the exercise of their duty and to incline them to act contrary to accepted standards of honesty and integrity, to avail improper business advantage. Bribery also includes an attempt to do any of the foregoing. Bribery includes advantages provided directly, as well as indirectly through a Third Party in return for unfair business advantage.
Code of Conduct	The Code of Conduct adopted by the Company from time to time.
Complaint Response Plan	A set of guidelines with respect to the investigation process on receipt of a Protected Disclosure including investigation procedures, reporting and Disciplinary Action(s).
Director(s)	This means a Director appointed on the Board of the Company including executive, non-executive, independent and nominee Director(s).
Disciplinary Action(s)	Any action that can be taken on the completion of or during the investigation proceeding including but not limited to a warning, imposition of fine, suspension from official duties, dismissal or any such action as is deemed to be fit considering the gravity of the matter
Disqualified Protected Disclosure	A Protected Disclosure which is not found to be valid and is disqualified in accordance with the Company's Whistle Blower Policy.



Employee(s)	Every employee of the Company, including the Directors employed with the Company and the employees including but not limited to regular employees, contractual employees and retainers.
Embezzlement	The fraudulent conversion of another's property by a person who is in a position of trust, such as an agent or Employee.
Forensic Computer Imaging	An element of computer forensics, which is the application of computer investigation and analysis techniques to gather evidence.
Good Faith	The absence of unethical and/or improper activity or any other Alleged Wrongful Conduct forming a reasonable basis for making a Protected Disclosure under the Policy. Good Faith shall be deemed to be lacking when the Whistle Blower does not have personal knowledge on a factual basis for the communication or where the Whistle Blower knew or reasonably should have known that the communication about the unethical and/or improper activity or Alleged Wrongful Conduct is malicious, false or frivolous. Although a Whistle Blower is not expected to prove the truth of an allegation, the Whistle Blower should be able to demonstrate that the Protected Disclosure is being reported in Good Faith.
Investigation(s)	The investigations conducted in accordance with this Policy.
Investigator(s)	Those person(s) or committee nominated, authorized, appointed, consulted or approached by the Redressal Committee or the Audit Committee, as the case may be, and includes an outside investigation agency, statutory auditor of the Company, and the police.
Protected Disclosure	Any grievance made, or concern expressed in Good Faith that disclosed or demonstrates information that may prima facie evidence an Alleged Wrongful Conduct, which is not in the best interest of the Company.
Redressal Committee	A Committee for the purpose of Complaint Response Plan. Refer Whistle Blower Policy for composition of committee.
Securities Law Violations	Frauds involving misrepresentation or untrue statements in connection with the sale of a security.
Subject(s)	A person or group of persons against or in relation to whom a Protected Disclosure has been made or evidence gathered during an Investigation.
Substance Abuse	The harmful or hazardous use of psychoactive (psychotropic) substances, including alcohol and illicit drugs
Third Party(ies)	A collective term for agents, intermediaries, vendors, suppliers, sub-contractors, resellers, contractors and agency staff, contract manufacturers and consultants with whom JBCPL may enter into agreement(s) for providing directly or indirectly materials and/or services. This includes associates of the foregoing as well.
Whistle Blower	An Employee, Director or other stakeholder making a Protected Disclosure under the Policy.
Whistle Blower Mechanism or Vigil Mechanism	A mechanism enabling all stakeholders, individual employees and their representative bodies or Directors to freely communicate their concerns about illegal or Unethical practices or other genuine concern.



1. Purpose and Objective

J. B. Chemicals & Pharmaceuticals Limited (“JBCPL” or “Company”) has implemented a Whistle Blower Mechanism to report instances of any misconduct, illegal or unethical practices, actual or potential violation of the Code of Conduct, internal policies or other applicable laws or regulations.

In order to ensure that all the Complaints received through the Whistle Blower Mechanism are acted upon appropriately and consistently; the Company has laid down the Complaint Response Plan Policy (“Policy”).

This Policy lays down the guidelines to be followed while responding to Protected Disclosures received under the Whistle Blower Policy. It also provides information regarding collection, collation and preservation of evidences.

This Policy should be read in conjunction with:

- i. Whistle Blower Policy

2. Roles and responsibilities of Redressal Committee

- i. Responsibility of Investigations and closure of Protected Disclosures shall reside with the Redressal Committee.
- ii. The Redressal Committee will also be responsible to ensure that the Investigation is completed within the stipulated timeframe
- iii. It will be the responsibility of the Redressal Committee to seek necessary approvals as per the exception process in case of an extension required for the completion of the Investigation.

3. Classification of the Protected Disclosure

All Protected Disclosures will be assigned one of the following categories:

- i. *Red category* if the Protected Disclosure is supported with evidence(s) or if the Whistle Blower has identified him or herself.
- ii. *Amber category* if the Protected Disclosure is not supported with any evidence and remains anonymous.

4. Classification of the Protected Disclosure

- i. The Redressal Committee shall assign a severity status to the Protected Disclosures based on the following:
 - a. Nature of Protected Disclosure
 - b. Seriousness of the Protected Disclosure
 - c. Impact of possible outcomes
 - d. Other prevailing circumstances like availability of supporting evidences provided by the Whistle Blower.



- ii. Given below is the indicative list of Protected Disclosures based on severity and potential impact on the Company:

Protected Disclosure	Severity level
Accounting and auditing matters	High
Securities Law Violations	High
Embezzlement	High
Bribery and corruption	High
Violation of policy or law/ regulation	High
Falsification of reports or records	High
Conflict of interest	High
Discrimination or harassment	High
Unauthorized use/ Leakage of confidential information of the Company and its customers	High
Violence or Threat	Medium
Sabotage or vandalism	Medium
Theft	Medium
Unsafe working conditions	Medium
Substance Abuse	Medium
Inappropriate Behavior	Medium

For further details, refer to the *Whistle Blower Policy*

5. Indicative prioritization of Protected Disclosures (to be read with section 3 and 4)

- i. The Redressal Committee shall assign a category (as per category details listed below) and severity level (as per section 6) to the Protected Disclosure.
- ii. Based on the category and severity level, priority will be assigned to Protected Disclosure as follows:

Priority level	Protected Disclosure	
	Category	Severity level
I	Red	High
II	Amber	High
III	Red	Medium
IV	Amber	Medium

- iii. The priority status of a Protected Disclosure may further be modified during the Investigation, if deemed necessary.



6. Action grid with the timelines for the completion of Investigation

- i. The timelines for completion of preliminary review and detailed Investigation by the Redressal Committee is elaborated in the table below:

Priority	Preliminary review	Completion of Investigation	Disciplinary Action
Priority 1	Redressal Committee to perform	20 working days from the date of receipt of Protected Disclosure	Redressal Committee, after consultation with the Audit Committee, shall recommend to the management of the Company to take such Disciplinary Action (or corrective action) as the Redressal Committee or the Audit Committee as the case may be, deems fit.
Priority 2	preliminary review about sufficiency of	25 working days from the date of receipt of Protected Disclosure	
Priority 3	facts to pursue the Protected Disclosure	35 working days from the date of receipt of Protected Disclosure	
Priority 4	within three working days of its receipt.	45 working days from the date of receipt of Protected Disclosure	

- ii. The Redressal Committee shall 'NOT' investigate the Protected Disclosure regarding sexual harassment at workplace. Any Protected Disclosure of the nature of sexual harassment at workplace received through the Whistle Blower Mechanism should be sent to the relevant internal committee specifically constituted for reviewing complaints of such nature.

Exceptions:

1. In case of one or more extension is required to complete the Investigation, the Redressal Committee shall seek a written approval from Audit Committee.
2. The exception request must include a rationale and an end date for the completion of the Investigation.

7. Procedure to be followed on receipt of Protected Disclosure

All Protected Disclosures received through various channels (as defined in **Annexure II** of the **Whistle Blower Policy**) shall be registered with a serial number and date.

An acknowledgment of the Protected Disclosure shall be sent to the Whistle Blower (where the Whistle Blower is not anonymous) by the Redressal Committee.

Notes:

1. If the Protected Disclosure is against any member of Redressal Committee or his/her team member or his/her reporting manager or direct reportee then, the concerned member will inform the Redressal Committee and Audit Committee to assign another individual to conduct the Investigation(s).
2. The Redressal Committee shall refer internal Protected Disclosures to the related department and inform the Audit Committee.



A. Preliminary review of the Protected Disclosure

- i. Protected Disclosures received through various channels (*as defined in Annexure II of the Whistle Blower Policy*) shall be forwarded to Redressal Committee for performing a thorough preliminary review.
- ii. The Redressal Committee shall perform the preliminary review.
- iii. The Redressal Committee may, at its sole discretion, make prima facie Investigations to decide if the Protected Disclosure has been made Bona Fide, in Good Faith, and is not a Disqualified Protected Disclosure. The preliminary review should be completed within the timeline described in section 6 of this Policy.
- iv. On the *completion* of the preliminary review, if the Redressal Committee believes that no enough facts are available to pursue the Protected Disclosure, they may consider the following:
 - a. The Redressal Committee shall request for any documentation and/or information with respect to a Protected Disclosure from the Whistle Blower. If the Whistle Blower does not respond or is unable to provide the additional information on being requested after repeated follow ups (*three attempts to follow up is suggested within one week or such extended time as the Redressal Committee feels appropriate*), the Redressal Committee shall inform the Audit Committee, who shall further report to the management of the Company and close the case after documenting the reasons.
 - b. If the Whistle Blower has not provided any contact information, Redressal Committee shall inform the Audit Committee and close the case with available information and reasons thereof.
- v. If the Redressal Committee believes that the Protected Disclosure is 'OUTSIDE THE PURVIEW' of the Whistle Blower Policy, it may, post approval from the Audit Committee direct such Protected Disclosures to the relevant internal department for enquiry. The Redressal Committee will follow up with the relevant internal department for closure and actions taken for closure.
- vi. If required, the Redressal Committee or Audit Committee may forward the Protected Disclosure to an independent outside agency to investigate the Protected Disclosure. The decision to outsource the Investigation of a Protected Disclosure to an outside agency may depend on the following factors:
 - a. Need for digital or computer forensic procedures.
 - b. Need for gathering information from external sources.
 - c. Need for any other procedures for which the required skill sets are not available internally.
 - d. If the result of internal Investigation did not reveal much or indicate possibilities of larger issues.

B. Detailed Investigation of the Protected Disclosure

- i. The Redressal Committee will conduct preliminary review of the Protected Disclosure and evaluate if the Protected Disclosure should be investigated further.

The Redressal Committee shall initiate an Investigation of the Protected Disclosure. The Committee may perform an Investigation itself or engage an Investigator(s) for the purpose



or an independent outside agency. After the completion of the detailed Investigation, a written report of the findings shall be made. Investigator(s) shall submit the written report to the Redressal Committee (if detailed Investigation was carried out by Investigator(s)) for review of completeness of the Investigation. The report should at the minimum include the following details:

- iii. Investigatory procedures followed
- iv. Results/ outcome of Investigation
- v. Root cause analyses and suggested resolution /recommendations
- vi. Repeated offences by the Subject, if any
- vii. Monetary or reputation damage caused to the Company

C. Recommendations on Disciplinary Action

- i. The Investigation report shall also contain recommendations for Disciplinary Action(s) to be taken. Depending on the nature of the Protected Disclosure, the Redressal Committee may also suggest Disciplinary Action(s) for fictitious or bogus complaints.
- ii. The recommendations for Disciplinary Actions may include verbal warning, written warning, pay reduction, demotion, withholding of perquisites like bonus etc. leading up-to dismissal or termination of the Subject depending on the gravity of the matter. (*Refer to section 9 "Procedure for initiating Disciplinary Action" of this Policy for more details*)
- iii. The Redressal Committee shall then share the Investigation report with its recommendations to the Audit Committee for any additional inputs regarding the recommendations.
- iv. Redressal Committee, after consultation with the Audit Committee, shall recommend to the management of the Company to take such Disciplinary Action(s) (or corrective action) as the Redressal Committee or the Audit Committee as the case may be, deems fit.

8. Guidance on Investigation(s)

A. Protection and non-retaliation

Unfair treatment shall not be given to a Whistle Blower by virtue of his or her having reported a Protected Disclosure under the Policy.

The Company shall ensure that any kind of discrimination, harassment, victimization or other unfair employment practices are not adopted against Whistle Blowers and complete protection is given to Whistle Blowers against unfair practices like retaliation, threat or intimidation of termination or suspension of service, Disciplinary Action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blowers' right to continue to perform his duties or functions including making further Protected Disclosures.

B. Planning and strategy

- i. The Redressal Committee/Investigator(s) should properly plan and strategize the procedures of an Investigation.
- ii. Internal communication protocols should be clearly established.
- iii. The Redressal Committee should review and provide guidance to Investigator(s) in relation to compliance with all the regulatory requirements during the course of an Investigation.



C. Procedures

Investigative procedures may include the following:

- i. Review of the documents available in the personnel file of the suspect.
- ii. Interview of the Subject, other Employees, vendors, etc.
- iii. Review of documentary and electronic evidence as made available to the Redressal Committee/Investigator(s) by the relevant department of the Employee.
- iv. Forensic Computer Imaging (should be done by certified professionals only).
- v. Desktop and database searches.
- vi. Background checks of the Subject, other Employees, vendors, etc.
- vii. Any other procedures deemed necessary based on the facts available for the case under review.

D. Redressal Committee/Investigator should:

- i. Consider seeking legal and expert opinion wherever required.
- ii. Not confront the Subject without appropriate evidence.
- iii. Always respect the rights of an individual.
- iv. Provide 'equal opportunity of being heard' to all.
- v. Maintain highest level of confidentiality.
- vi. Maintain a record of all events – meetings, site visits, telephone calls, etc.
- vii. Consider usage of appropriate headers in communication like "*strictly confidential*".

9. Procedure for initiating Disciplinary Action(s)

- i. The Redressal Committee, in consultation with management of the Company, may take Disciplinary Action(s) against the following:
 - a. Subject of the Protected Disclosure
 - b. Employee, other than the Subject, who is/are involved in the misconduct.
 - c. The Whistle Blower, if the Protected Disclosure is proven to be frivolous or bogus or made with malafide intent based on forged or misleading evidences.
- ii. The procedure for taking Disciplinary Action must be based on principles of '*natural justice*'. Hence, before undertaking any Disciplinary Action, the Redressal Committee must ensure the following:
 - a. The Subject(s)/other Employee(s)/ Whistle Blower(s) has/ have been informed clearly of the charges levied against him/her/them.
 - b. The witnesses, if any, have been examined in respect of the charges.
 - c. The Subject(s)/other Employee(s)/Whistle Blower(s) has/have been given a fair opportunity to be heard.



iii. **Categorization of misconduct:** The Redressal Committee/Investigator(s) shall categorize the misconduct as 'minor, major, gross or unsubstantiated' based on the outcome of the Investigation.

Categorization	Description	Indicative scenarios
Minor misconduct	Minor misconduct can be described as any act of indiscipline or behavior by an Employee that causes minimal harm or damage and is less detrimental to the reputation and assets of the Company.	<ul style="list-style-type: none"> • Unlawfully restricting work efficiency and productivity • Inappropriate behaviour with junior team members or other Employees • Carelessness with keys and equipment that may cause minor damage to property or individual • Non-compliance with safety guidelines or regulations due to negligent behaviour that may cause minor danger to property or individual • Attempting to provoke a fight or intimidating others by using strong words
Major misconduct	Major misconduct is any act of indiscipline or behaviour that causes substantial harm or damage and is detrimental to the reputation or assets of the Company	<ul style="list-style-type: none"> • Leakage of confidential information by negligent behaviour • Engaging in political activity during assigned hours of employment • Running parallel businesses while employed with the Company • Carelessness with keys and equipment that may cause serious damage to the Company's property or individual • Non-compliance with safety guidelines or regulations that may cause danger to life or property or individual
Gross misconduct	Gross misconduct (including intentional act and gross negligence) is an act which may be considered as serious, to justify the termination of the Subject for the offence. Such acts affect the relationship of trust and confidence between the Company and Employee, making the working relationship difficult to continue at times.	<ul style="list-style-type: none"> • Accepting or giving Bribes while performing assigned duties • Intimidating others by threat of physical force • Discrimination against women Employees • Instances of conflict of interest • Theft of personal or Company property (e.g. equipment, supplies, etc.) • Confidentiality violation by sharing Company information with Third Parties or competitors • Misconduct related to accounting or auditing matters • Carelessness with tools, keys and equipment that may cause danger to life, property or public safety



		<ul style="list-style-type: none"> • Non-compliance with safety guidelines or regulations resulting in the loss of life or property
Unsubstantiated	If there is insufficient evidence for the Redressal Committee/Investigator(s) to conclude that the Alleged Wrongful Conduct or violation has occurred.	<ul style="list-style-type: none"> • Any Protected Disclosure(s) with insufficient evidences or facts to prove the case
Frivolous Complaint	Protected Disclosure with no merit, which are proven to be baseless or reported other than in Good Faith.	<ul style="list-style-type: none"> • Protected Disclosure which are subsequently proven to be baseless or reported with malafide intent

iv. **Indicative Disciplinary Action matrix:** Based on the category of misconduct, the following consequences will be applicable. The following matrix contains indicative consequences that may be administered if the misconduct has been proven after the Investigation

Misconduct	First offence	Second offence	Third offence
Minor	<ul style="list-style-type: none"> • Verbal counselling 	<ul style="list-style-type: none"> • Written warning 	<ul style="list-style-type: none"> • Written reprimand • Suspension
Major	<ul style="list-style-type: none"> • Written warning 	<ul style="list-style-type: none"> • Suspension • Written reprimand 	<ul style="list-style-type: none"> • Pay reduction • Withholding of promotion and bonus • Termination
	<ul style="list-style-type: none"> • Suspension • Written reprimand 	<ul style="list-style-type: none"> • Pay reduction • Withholding of promotion and bonus 	<ul style="list-style-type: none"> • Termination
Gross	<ul style="list-style-type: none"> • Withholding of promotion and bonus 	<ul style="list-style-type: none"> • Demotion • Suspension 	<ul style="list-style-type: none"> • Termination
	<ul style="list-style-type: none"> • Demotion • Suspension 	<ul style="list-style-type: none"> • Termination 	<ul style="list-style-type: none"> • Not applicable
	<ul style="list-style-type: none"> • Termination 	<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • Not applicable
Unsubstantiated	No Disciplinary Action(s)		
Frivolous Complaint	<ul style="list-style-type: none"> • Verbal counselling • Written warning 	<ul style="list-style-type: none"> • Written reprimand 	<ul style="list-style-type: none"> • Suspension • Termination
	<ul style="list-style-type: none"> • Written reprimand 	<ul style="list-style-type: none"> • Pay reduction • Withholding of promotion and bonus 	<ul style="list-style-type: none"> • Suspension • Termination

v. These recommendations for Disciplinary Actions are based on the nature and severity of the offense. It must be cautioned that individual cases vary greatly in terms of the clarity of issues involved, the level of proof obtained, and the nature and extent of any mitigating circumstances.



- vi. The verbal counselling or written warning should set out the nature of the misconduct and the change in behavior or improvement in performance expected (with timescale) from the Subject. The Subject should be told how long the warning will remain current and should be informed of the consequences of further misconduct, or failure to improve performance, within the period agreed upon by the Redressal Committee depending on seriousness of the Protected Disclosure.
- vii. If the Subject's first misconduct is major in nature, it may be appropriate to move directly to a severe Disciplinary Action, without any warning. This might occur where the Subject's actions have had, or are liable to have, a serious or harmful impact on the Company or its reputation.
- viii. Some acts, termed as gross misconduct, may be so serious in themselves or have such serious consequences that they may call for the termination of the Subject following the first offence. But a fair disciplinary process should always be followed, before terminating for gross misconduct. Further, the Subject should be informed as soon as possible of the reasons for termination.
- ix. In cases of gross misconduct, where there are risks to the Company's property or responsibilities to other parties, consideration shall be given to a brief period of suspension with full pay whilst an unhindered Investigation is conducted. The Redressal Committee may also consider alternative actions which would be more acceptable to the Subject yet serve the same purpose as a suspension e.g., agreeing to a temporary transfer to other duties or another workstation without loss of pay or the availing of annual holidays to which the Employee is entitled. Any action taken will be reviewed to ensure it is not unnecessarily protracted and it shall be made clear that such action should not be considered as a Disciplinary Action.
- x. Where the Subject is persistently unable or unwilling to attend a disciplinary meeting without good cause or does not cooperate, the Redressal Committee shall make a decision based on the information and evidence available.

10. Factors to be considered for deciding the Disciplinary Action

- i. The Disciplinary Action(s) recommended by the Investigator(s)/Redressal Committee should be commensurate with the seriousness of the 'misconduct'. The Redressal Committee has the discretion to decide the appropriate Disciplinary Action for a particular misconduct, subject to the obvious qualification that the Disciplinary Action(s) should not be unduly excessive, and it must be imposed for good and sufficient reasons.

Note: Mere inability to substantiate a Protected Disclosure or provide adequate proof need not attract action against the Whistle Blower(s). Malicious intent of the Whistle Blower(s) needs to be established after the conclusion of the Investigation for recommending of any action against the Whistle Blower(s).

- ii. The Investigator(s)/Redressal Committee must ensure to deal with all the issues in a fair, transparent and consistent manner, by ensuring the following:
 - a. All steps as defined under a Complaint Response Plan should be taken without unreasonable delay.
 - b. The timing and location of all hearings should be reasonable.
 - c. Investigator(s)/Redressal Committee should carry out necessary Investigation, to establish the facts of the case.
 - d. Hearings should be conducted in a manner which enables Employees to explain their cases.



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- iii The Investigator(s) and Redressal Committee shall take all reasonable steps to ensure confidentiality is maintained throughout the process.
- iv The Investigator(s)/Redressal Committee must consider the following aspects before proposing any Disciplinary Action(s):
 - a. The severity of the misconduct of violation;
 - b. The seniority and the tenure of the Subject(s)/ other Employee(s)/ Whistle Blower(s);
 - c. Job relatedness and timeframe for handover of critical responsibilities;
 - d. The impact of the misconduct/violation on other Employees;
 - e. The impact of the misconduct/violation on the department or the Company;
 - f. Damage to Company property; and
 - g. The intent of Subject(s)/ other Employee(s)/ Whistle Blower(s).

Escalating and mitigating factors

- i. When using this Policy, the Investigator(s)/Redressal Committee must always consider the nature of the incident, the frequency of the violation, and the Subject/ Employee's overall work record before recommending any Disciplinary Action(s).
- ii. A corrective process of progressive discipline is generally used but some violations could be of such a serious nature that a Disciplinary Action could lead directly to a suspension or termination.
- iii. Once the Disciplinary Action(s) for a confirmed breach is identified: The Investigator(s)/ Redressal Committee may consider certain additional factors that could help ensure that the punishment is either not too harsh or not too lenient, considering all relevant factors. These additional factors could either be in favor or against the Subject depending on the situation. Few sample additional factors are as listed below:

Escalating factors	Mitigating factors
<ul style="list-style-type: none"> • Fact or evidence regarding the violation that might result in increased sanctions • Direct relationship of the alleged offense to the Subject(s)/ Employee(s)' position • Prior notice given to the Subject(s)/Employee(s) • Prior disciplinary history of the Subject(s)/Employee(s) • Brief period of time since the last violation by the Subject(s)/ Employee(s) • Pattern of similar violations by the Subject(s)/ Employee(s) • Number of total violations by the Subject(s)/ Employee(s) • Evidence that violation was willful or intentional 	<ul style="list-style-type: none"> • Information or evidence regarding the violation that might result in decreased sanctions • Technical or inadvertent error by the Subject(s)/Employee(s) • No prior notice given to the Subject(s)/Employee(s) • No prior disciplinary history of the Subject(s)/Employee(s) • Extensive period of time since the last violation • No pattern of similar offenses by the Subject(s)/Employee(s) • No evidence that the violation was willful or intentional • No evidence that the violation was grossly negligent



<ul style="list-style-type: none"> • Evidence that the violation was grossly negligent • Impact to Company operations, environment, customers, etc. • Impact to health or safety of customers and/or other Employees or public at large 	<ul style="list-style-type: none"> • Length of employment (with no recent issues) • Minimal impact to Company operations, environment, customers, etc. • Other mitigating factors such as disability etc.
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Note: The Disciplinary Action recommended by the Investigator(s) shall be under the oversight and instructions of the Redressal Committee.

11. Corrective action

- i. Upon occurrence of any fraud or misconduct, the management of the Company may consider taking action to remedy the harm caused.
- ii. Management of the Company may wish to consider taking one or combination of the following steps where appropriate:
 - a. Voluntarily disclosing the results of the Investigation to the government or other relevant body (e.g., to law enforcement or regulatory authorities) for independent Investigation(s)
 - b. Remedying the harm caused (e.g., initiate legal proceedings to recover monies or other property, compensate those injured by the misconduct, etc.)
 - c. Examining the root causes of relevant control breakdowns, ensuring that risk is mitigated and that controls are strengthened
 - d. Administering discipline to those involved in inappropriate actions as well as to those in management positions who failed to prevent or detect such events, and
 - e. Communicating to the wider Employee population that the management took appropriate and responsive action.

12. Status update on the Protected Disclosures

- i. If the Whistle Blower(s) requests a status update on the reported Protected Disclosure at any time during the Investigation, the Redressal Committee shall be responsible to share the information with the Whistle Blower(s) after consulting the Audit Committee.
- ii. On the closure of the Investigation, a status update shall be shared with the Whistle Blower(s) as well as with the Subject(s) about the final decision on the Investigation. However, the Redressal Committee, after seeking approval from the Audit Committee, may decide to share a status update, at any time during the Investigation, with the Whistle Blower(s) as it may deem fit.

13. Reporting

- i. The Redressal Committee shall submit a quarterly report to the Audit Committee and the Board with status of all Protected Disclosures together with the results of Investigations, Disciplinary Actions recommended and implemented.
- ii. On the disposition of the case, the decision to refer the Investigation result to any appropriate law enforcement and/or regulatory agencies shall be made by the Audit Committee.



14. Maintenance of records

- i. The Redressal Committee shall maintain the notes of interviews conducted for the Investigation
- ii. The Redressal Committee shall ensure that appropriate records are maintained for all the Protected Disclosures received through Whistle Blower channels. Following things should be considered in this regard:
 - a. Confidentiality of all records/evidences should be maintained and kept securely under lock and key
 - b. Originals and appropriate back up for all records should be retained for all records
 - c. All documents and data secured during the Investigation including the Investigation report, should be handled and preserved with an assumption that it may be presented as evidence in the court of law
 - d. Data gathered from computers / laptops / mobile / other storage devices of the Subject and other Employees should be secured only by certified forensic professionals, in a manner that it is admissible in court of law
 - e. All records should be preserved for a period of seven (7) years (unless under litigation).
- iii. The human resources (HR) department shall ensure that appropriate records of Disciplinary Action(s) taken, are maintained and updated in the personnel file of the Employees.

15. Consequences of non-compliance

Non-compliance or violations of this Policy will be dealt with strictly. Potential non-compliances and violations puts JBCPL and its respective representative(s) at legal risk and penal action. Any Employee found to be violating this Policy shall be subject to disciplinary measures in accordance with the disciplinary policies and Code of Conduct of the Company. Repeated violations may lead to the termination of employment and/or legal proceedings. Violations by Third Party may extend in termination of contract.

Employees or stakeholders can confidentially report a violation of this Policy or potential violation of this Policy by writing to the Redressal Committee or through the whistle blower hotline. For further details refer Whistle Blower Policy.

16. Exception management

Any exception to this Policy requires a prior written approval from Chairperson of the Audit Committee. This approval should be obtained via email.

17. Training and certification

Employees shall be adequately trained regarding the functioning of this Policy. Employees shall attend periodic trainings and obtain internal certifications to attest their comprehension of the pre-requisites of this Policy.



18. Review and revision

This Policy shall be reviewed and revised as and when necessary, however, no later than one year from the date of implementation of the last Policy version. Further, the Policy is also subject to periodic review and revisions based on existing circumstances that require JBCPL to do so. Employees shall ensure to have the knowledge and comply with the latest available version of the Policy only.

