

**WHISTLE BLOWER POLICY**

REF. NO.	MMPL/CSR/HR/P 08	Issue No./Date	00/30.06.2024
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Policy Objectives: –

1. To provide all employees & directors mechanism to report Improper acts.
2. To provide adequate safeguards against victimization for making protected disclosures.

Scope:–

This policy is an extension of the company's Code of Conduct. This Whistle blower's role is that of a reporting party with reliable information. A whistle blower is not required or expected to act as an investigator or finder of the facts, nor would the Whistle Blower have a right to participate in any investigative activities unless requested by the investigators.

Disqualification: –

1. Any abuse of the protection given under this policy to the whistle blower will warrant disciplinary action.
2. In case any person is found misusing this whistle blower policy, or making disclosures which are found to be mala fide, malicious, baseless, frivolous, or reported otherwise than in good faith such person will be disqualified, from reporting any further Protected disclosures under this policy.

Audit Committee: –

Whistle Blower can report by writing an e-mail to ethics committee by sending mail to ethicscommittee@mantrimetallics.in or communicating via phone call to any members of ethics committee or via written complaint using complaint box. Ethics Committee shall be formed regarding whistle blower which will include,

- MD,
- VP – Operations,
- Head of HR and administration,
- Any other person recommended by MD.

Ethics committee will form an audit committee to investigate the matter and will submit the report to ethics committee. Ethics committee will take suitable action based on the report.

Prevention Mechanism: –

1. Training
2. Third party audit of accounts.
3. Maker and Checker mechanism for purchase activity.
4. Maker and Checker mechanism for cash vouchers.
5. Automation of ERP system. For example automatic checking of labor contract bills, transport bills so that ERP data can be checked against bills.
6. All transactions through online or cheque.
7. Use of digital signature wherever possible.

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8. Circulation of ethics policy, anti-bribery, anti-fraud policy, code of conduct to stake holders, suppliers, bank etc.
9. Care taking of whistle blowers.
10. Procedure for enquiry conduction against fraud or suspected.
11. Ethics Committee forms regarding whistle blower, members included will be MD, CEO, VP, Head & administration person, the employees, can write an e-mail to ethics committee by sending mail to ethicscommittee@mantrimetallica.in or communicating via phone call to any members of ethics committee or via written complaint note putted in complaint box.
12. The other source of knowing information is through any of controls mentioned above like account audit, MIS report etc.
13. Once information received, the ethics committee based on nature of fraud, state of fraud, dept. of fraud will form a suitable sub-committee of expert members within a company or outside people or mix of them or 3rd party agency.
14. Sub-committee will do systematic verification of all documents, facts & will submit investigation report to the committee.
15. Based on report, committee will take appropriate decision which lead to disciplinary action, civil or criminal action under IPC act or administrative action.

Protection: –

1. No unfair treatment shall be meted out to whistle blower on account of his/her having a protected disclosure under this policy. The company, as a policy, condemns any kind of discrimination, harassment or victimization or unfair employment practices being adopted against any whistle blower.
2. A Whistle Blower may report any violation of the above clause to the chairman of the committee, who shall forthwith investigate into the matter.

Reporting: –


The chairman of the audit committee shall submit a report about all protected disclosures referred to him with the result of the investigations to the Managing Director and the Board of Directors of the Company.

Retention of Documents: -

All protected disclosures, documentation in relation to the investigation shall be retained by the company for minimum period of 3 years.

Communication of this Policy: -

1. Training.
2. Notice board.
3. Company Web site.
4. Joining of new employee.

	MANTRI METALLICS PVT.LTD.		
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Committee Members -

Sr. No.	Members Name	Designation	Mail ID	Contact Details
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03	Mr. Vinay Karmalkar	Finance Head	finance@mantrimetallics.com	9049009650
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