

# WHISTLEBLOWER POLICY

For: GRG Polydynamics Private Limited

Address: No. 2/2A, Vallam A Village, Palnallur Village, Vallakottai, Sriperumbudur, Tamil Nadu – 631604

## 1. Purpose

The purpose of this Whistleblower Policy is to provide employees, suppliers, and stakeholders of GRG Polydynamics Pvt. Ltd. with a confidential and secure mechanism to report unethical conduct, misconduct, fraud, or violations of Company policies, while ensuring protection from retaliation or victimization.

#### 2. Scope

This policy applies to all employees, directors, contractors, vendors, consultants, and any third-party business associates who have a professional relationship with GRG Polydynamics Pvt. Ltd.

#### 3. Policy Statement

GRG Polydynamics promotes transparency, integrity, and accountability in all operations. The Company encourages individuals to report concerns about unethical practices without fear of retribution. All reports will be handled confidentially and investigated impartially.

#### 4. What Can Be Reported

- Bribery, corruption, or fraudulent practices
- Violation of laws or regulations
- Misuse of company assets or funds
- Harassment or discrimination
- Breach of confidentiality or data privacy
- Violation of Code of Conduct, Ethics Policy, or internal policies
- Environmental, safety, or health hazards

## **5. Reporting Channels**

Employees and stakeholders may report concerns through any of the following secure channels:

- Email: ethics@grgpolydynamics.com
- Direct communication with the Whistleblower Committee
- Confidential Whistleblower Drop Box at the facility

Reports can be made anonymously, and all complaints will be acknowledged within 3 working days.



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#### 6. Confidentiality and Protection Clause

All complaints under this policy shall be treated with strict confidentiality. The identity of the whistleblower will not be disclosed without their explicit consent, except where legally required.

Whistleblowers are protected from any form of retaliation, discrimination, or harassment arising from reporting a genuine concern in good faith. Any retaliation against a whistleblower will result in disciplinary action against the responsible person(s).

## 7. Investigation Procedure

- The Whistleblower Committee will review all complaints within 7 working days.
- An impartial investigation will be conducted, and findings will be documented.
- The Committee will recommend corrective or disciplinary actions to Management.
- Investigations will typically be completed within 30 working days, unless extended with justification.

#### 8. Whistleblower Committee

The Whistleblower Committee shall consist of the following members:

- Chairperson Managing Director or nominee
- Member HR Head
- Member Compliance Officer
- Member Legal / External Advisor (if required)

#### 9. False Allegations

Whistleblowers are expected to report in good faith. If any report is found to be intentionally false or malicious, disciplinary action may be taken against the individual making such claims.

### 10. Record Keeping

All whistleblower complaints, investigation reports, and resolution records shall be securely maintained by the Compliance Officer for a minimum of 5 years as per the Data Retention & Disposal Policy.



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#### 11. Review and Amendment

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This policy shall be reviewed annually or when significant changes occur in the Company's operations or regulatory requirements. Updates will be approved by the Managing Director and communicated to all employees.

Authorized Signatory:

GRG/HR/D/17 Rev no:00 Rev date:08.02.2024