

**Whistle Blower**

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**PURPOSE**

The procedure has been defined to allow our employees disclose information of wrong doing within the Organization

**Scope**

This policy will cover the management employees of Altern Energy Limited whether regular or contractual, in any grade, working at head office, plant, regional offices or any other place assigned by the Company.

**Why do we need to blow the whistle?**

Our reputation is built on our action. When those actions are ethical, our reputation is one of a Company with whom people want to deal. An employee may blow a whistle if any of the following circumstances / event is observed

- I. Bribery and corruption
- II. Conflicts of interest
- III. Environmental issues
- IV. Fraudulent financial reporting
- V. Giving or receiving inappropriate gifts or entertainment
- VI. Harassment or discrimination
- VII. Improper accounting procedures
- VIII. Improper disclosure of confidential information
- IX. Safety issues
- X. Theft Violence or threatening behavior
- XI. Violation of securities and exchange regulations
- XII. Violation of law at any level

**Whistle Blowing Committee (WBC).*****Requesting board to form a WBC committee***

WBC can also call upon and include any internal employee for investigation. However, this will entirely depend upon the nature and requirement of the investigation.

**How do I Raise a concern?**

You may raise your concern through following ways –

- i. Email –
- ii. Call to register your concerns with Secretary of Compliance Committee –
- iii. Set up a one to one meeting with any member of Whistle Blowing Committee and register

Your concerns

Once your concern has been registered with the member of Compliance Committee, following procedure will be initiated.

**Procedure of Investigation**

1. Secretary of Compliance Committee shall call a meeting of WBC "Whistle Blowing Committee" i.e. within next three working days.
2. WBC shall investigate the matter i.e. if they decide to proceed with the investigation.
3. WBC shall present its findings to the MC for final decision

Complete process from Complaint lodging to decision making shall be completed within four weeks.

**Anonymous Allegations**

Allegations made by anonymous emails are necessarily difficult to investigate and, for that reason, cannot always be given the same consideration as attributed emails. On all anonymous emails WBC shall consider seriousness and credibility of the allegations also accounting for the feasibility of investigating them and the reason(s) of keeping anonymity.

**Confidentiality**

Employee may specifically ask for his/her names not to be disclosed, this will be respected subject only to any requirement to disclose where the investigation may otherwise impede.

**Victimization**

Disciplinary action will be taken against anyone victimizing or harassing an employee because he/she has raised concerns.

**Unproven Allegations**

All employees have complete right to raise their genuine concerns; however employees should be particularly specific and have evidence to support their claims as well.

If an employee makes an allegation that is not confirmed by WBC, then the MC reserves the right to initiate suitable action against the employee for misleading facts or raising false alarms.

**Deliberately False Allegations**

Disciplinary action shall be taken against any employee deliberately making allegations they know to be false or unfounded, whether frivolously or maliciously. Action will also be taken against an employee inventing or otherwise falsifying facts in order to make a complaint

**Records of Complaints**

Secretary of Compliance Committee shall be responsible for maintaining records / meeting minutes of concerns raised, meetings held and outcomes. Records will be kept in a form, which does not compromise confidentiality.

This policy will be effective from 01 January 2016.