

# WHISTLE BLOWER POLICY

## **Objective**

This Whistleblower Policy of Globe Security Services Private Limited is aimed at establishing a vigil mechanism for its employees and other stakeholders to report genuine concerns in an appropriate manner without any fear of reprisal. The Policy is intended to encourage and enable reporting of any wrongdoing or actual/suspected fraud or any other unethical behaviour or practice related to a potential violation of the Company's Policy on Ethics, Transparency and Accountability and Code of Conduct (collectively called "**Violations**") by following the procedure and manner given therein.

## **Coverage**

This Policy shall be applicable for all the units of the Company in India. Whistleblowers could be employees as well as third parties including vendors, suppliers, customers or any other person who may wish to disclose / report a concern related to a potential Violation of the company's policy and accountability.

## **Complainant to report in good faith**

Anyone filing a complaint concerning a Violation or suspected Violation must act in good faith and have reasonable grounds for believing the alleged wrong doing / unethical activity. In this context, "good faith" means that one will (i) provide all of the information one has; (ii) reasonably believes that the allegations are substantially true; and (iii) is not acting for personal gain. Any allegation that turns out to be unsubstantiated or motivated or made maliciously or made knowingly it to be false and not under good faith will be viewed seriously and attract disciplinary action.

## **Protection of Whistle Blowers**

The mechanism and process in this Policy is designed to offer protection to the whistleblowers provided that the disclosure made / concern raised / allegations made by a whistleblower is in good faith and the alleged action or non-action, constitutes a genuine and serious breach of what is laid down in Company's Policy and Code of Conduct.

The Company is against any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against whistleblowers. It is committed to provide protection to whistleblowers against any unfair practices like retaliation, threat or intimidation, termination/ suspension of service, disciplinary action or the like, including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

However, this Policy may not be used as a defence by an employee against whom an adverse personnel action has been taken for legitimate reasons. It shall not be a violation of this Policy to take disciplinary action against an employee, whose conduct or performance warrants that action, separate and apart from that employee making a complaint under this Policy.

### **Compliance Department**

Compliance head is the person nominated under this Policy for implementing the provisions of this Policy. Compliance head shall be responsible for investigating the reported Violations and resolving complaints reported to them. Any major Violation as deemed appropriate by the Compliance department shall be reported to the Board which shall address all such reported concerns/ complaints.

### **List of Exclusions**

The following types of complaints will ordinarily not be considered and taken up:

1. Matters pending before judiciary or sub judiciary body and like other body;
2. Complaints that are immaterial or frivolous in nature;
3. Complaints that are vague;
4. Old matters where details or records are not available;
5. Matters related to service matters or personal grievance (e.g. increment, promotion, appraisal, etc.); or
6. Any customer/ product related grievance.

### **Reporting Procedure**

Every person who chooses to report under this Policy is expected to have read and understood the provisions thereof and abide by it. It is expected and recommended that any person who wishes to report, do so after gathering adequate facts/ data to substantiate the Violation and not complaint merely based on hearsay or rumour.

In general, reporting procedure shall be as below:

- Any employee or third party can communicate any Violation or suspected Violation to the compliance head by addressing a letter to him at Globe Security Services Private Limited, GB1 to GB3, Karma Stambh Complex, LBS Marg, Vikhroli West, Mumbai – 400083 sending an e-mail at [compliance@globesecurity.co.in](mailto:compliance@globesecurity.co.in).
- The whistleblower must disclose his/ her identity in the communication. Concerns expressed anonymously may not be investigated as it would not be possible for the Company to interact with the whistleblower.
- For effective investigation of the Violation or suspected Violation, the whistleblowers should submit the complaint or Violation to the Company directly and not publicise

the same. Violations or suspected Violations should be submitted on a confidential basis with the Company.

- It shall not be mandatory for compliance head to investigate any or all complaints or Violations reported under this Policy and the same shall be treated in line with the authenticity, gravity of the matter and Company policy/ practice in this regard.

### **Investigation of Reported Violation**

All Violations or suspected Violations reported under this Policy shall be reviewed by the compliance head. The investigation shall be carried out by following principles of natural justice.

### **Amendment**

The Company reserves the right to rescind, amend or modify this Policy in whole or in part, at any time without assigning any reason.