

Whistle Blower Policy

| | | |
|---------------------------------------|-----------------|---------------|
| Policy Ownership | Human Resource | |
| Document Version Number | Version 2 | |
| Previous Version Approval Date | August 18, 2025 | |
| Prepared By | Edlyn Joseph | HR Operations |
| Approved By | Swati Sinha | HR Head |



| | |
|---------------------------------------|---|
| 1. Objective..... | 3 |
| 2. Scope..... | 3 |
| 3. Definition | 4 |
| 4. Reporting Mechanism | 4 |
| 5. Investigation Procedure..... | 5 |
| 6. Outcomes and Actions..... | 6 |
| 7. Protection to Whistle Blowers..... | 6 |
| 8. Retention of records | 7 |
| 9. Policy Communication..... | 7 |
| 10. Amendment to the policy | 7 |



1. Objective

The purpose of this policy is to establish a vigil mechanism for directors, stakeholder and employees to report genuine concerns about unethical or improper activities, actual or suspected fraud, or violations of the company's policies. The objective is to provide a framework that promotes responsible and secure whistleblowing while providing adequate safeguards against the victimization of employees who raise such concerns. This policy does not release employees from their duty of confidentiality, nor should it be used for raising malicious or unfounded allegation.

The policy complies with:

- Section 177(9) & (10) of the Companies Act, 2013
- Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Scope

This policy applies to all employees and Directors of Signpost India. It covers malpractices and events including, but not limited to:

- Abuse of authority
- Financial irregularities, including fraud or suspected fraud
- Manipulation of company data/records
- Breach of contract or deliberate violation of law/regulation
- Negligence causing substantial danger to the organization or its employees
- Wastage or misappropriation of company funds/assets
- Disclosure of confidential/proprietary information
- Breach of the employee Code of Conduct
- Criminal Offence/Deliberate violation of law/regulation
- Any other unethical, biased, favoured, imprudent event.



3. Definition

Whistle Blower: A person (employee, director, or stakeholder) who reports a Protected Disclosure.

Protected Disclosure: A written communication made in good faith, reporting concerns listed in Section 2.

Subject: The individual against whom a report has been made.

Chairman of the Audit Committee: The Chairman of the Audit Committee of the Board of Directors of the Company.

Management Committee: As constituted under Section 177 of the Companies Act.

Investigation Committee: A panel designated to process and investigate complaints.

Investigator: Individual(s) appointed by WBC to conduct a fair investigation.

4. Reporting Mechanism

Disclosures can be made through:

All employees are eligible to make protected disclosures. Disclosures should be made in writing to ethic@signpostindia.com (email/letter) as soon as possible after becoming aware of the issue. Anonymous reporting is allowed; such cases will be evaluated based on the seriousness, credibility, and ability to verify the concern. Employees can have direct access to the Audit Committee Chairperson, on need basis, to seek protection against any sort of victimization by sending the same to the Chairman of the Audit at the below mentioned address:

Chairman – Audit Committee

Signpost India Limited

202, Pressman House

70A, Nehru Road

Vile Parle East, Mumbai 400 099



To ensure a thorough investigation, the complaint should be as specific as possible and include the following details:

- The individuals or parties involved.
- The department or location where it happened.
- When it happened (date or period).
- The type of concern (e.g., financial reporting, employee misconduct).
- Any proof or where proof can be found.

Timelines:

- Disclosures should be reported within 30 days of discovery.
- Critical elements: Person(s) involved, nature of misconduct, dates/locations, supporting documents.
- Prior efforts to address the problem, if any.

Disclosures should be sent to the Investigation Committee via a secure channel, such as an email address or a sealed envelope.

5. Investigation Procedure

The **Investigation Committee** will review disclosures and initiate an unbiased, confidential investigation.

Timeline: Within 90 days (extendable with valid reason).

The Subject will be informed in writing and may present their response.

Investigators may:

- Call for documents
- Interview witnesses
- Access systems with proper authorization
- Confidentiality will be maintained to the maximum extent possible.
- Whistle blowers are not investigators and should not conduct self-investigations.



6. Outcomes and Actions

Post-investigation, the Investigation Committee may recommend:

- Disciplinary action or penalty.
- Suspension or termination of contracts or employment.
- Remedial actions including reinstatement or compensation.
- Other preventive steps to avoid recurrence.
- Frivolous or malicious complaints will result in disciplinary action against the complainant.
- May recommend reprimand or injunction.

7. Protection to Whistle Blowers

The company is committed to protecting any employee who, in good faith, makes a disclosure. No personnel who make a disclosure in accordance with this policy shall suffer from reprisal, discrimination, or adverse employment consequences. The company will keep the identity of the whistleblower confidential to the extent possible and permitted by law. If a whistleblower believes they are experiencing retaliation, they should immediately report it to a supervisor, manager, or directly to the Investigation Committee.

Disqualification

Protection under this Policy would not mean protection from disciplinary action arising out of false/malicious complaints made by a Whistle Blower. Repeated frivolous complaints would lead to disqualification and penalty.



8. Retention of Records

All documentation (complaints, investigation notes, decisions) will be securely retained by the **HR** into employee records if any action has been taken against the employee the same needs to be tracked and reported to the Managing Director.

9. Policy Communication

All Department Heads must communicate this policy to their teams. HR will include it during employee induction. **Annual confirmations** will be collected to ensure awareness and compliance.

10. Amendment to the Policy

The Board of Signpost India Limited reserves their right to amend this policy from time to time. Changes will be communicated in writing and made available to all employees and stakeholders.

