



# WHISTLE BLOWER POLICY

*The Policy articulates the Company's processes & procedures for raising & addressing genuine concerns against any violation of TRL Krosaki Code of Conduct and providing protection to the person(s) raising such concerns.*

## **1. Preamble**

The purpose of this Policy is to be consistent with the relevant provisions of the Companies Act, 2013 and the TRL Krosaki Code of Conduct guidelines.

The Companies Act, 2013 requires the Company to have a Whistle Blower Policy and to establish a vigil mechanism for Members of the Board of Directors and Employees to report concerns about unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct or Anti-Bribery & Anti-Corruption Policy to ensure transparency across the Company. The mechanism should also provide for adequate safeguards against victimization of director(s)/employee(s) who avail of the mechanism.

## **2. Applicability**

This Policy applies to all Directors and Employees of TRL Krosaki Refractories Limited. The Policy also extends and reaches out to the Company's Vendor partners, who are also encouraged to raise concerns against violation of Company's Ethics related Policies.

## **3. Reporting Concerns**

### **3.1 Whistle Blower**

A "Whistle Blower" is defined as any Employee or Director or Vendor, who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct or related Policies.

### **3.2 Principle of Reporting**

If, anyone, to whom this Policy is applicable, believes in good faith that one of the provisions of the TRL Krosaki Code of Conduct or related Policies has been or is about to be violated, he or she should immediately inform / raise his or her concerns regarding an already committed or possible illegal act or ethical violation.

### **3.3 What to Report**

Anyone, who has any concerns relating to actual or potential illegal or unethical practices in the following areas should report his/her concerns under this Policy. However, the following is an indicative list and not an exhaustive one.

- Harassment or Discrimination & Workplace Violence
- Disclosure of Confidential Information and Intellectual Property

- Privacy breach
- Fraud or questionable accounting/financial reporting
- Corruption and improper transactions
- Improper purchase and sales practices aimed at favoring someone for personal gain
- Conflicts of interest
- Anti-competitive behavior
- Theft, misuse of Company's assets
- Retaliatory action against someone as a matter of revenge
- Any other illegal or unethical practices which violates the Code of Conduct or related Policies.

### **3.4 Channels of reporting concerns**

Anyone, who desires to report a concern, can do so, in strict confidence, through email, telephone, letter or in-person meeting.

The Concerns can be reported to the following designated authorities;

#### **(a) Members of the Board of Directors of TRL Krosaki**

Members of the Board of Directors can report directly, in writing, to the Chairman of the Audit Committee.

#### **Chairperson of the Audit Committee:**

**Mr. Pradeep Vasudeo Bhide**

D-1/48, 1<sup>st</sup> floor, Vasant Vihar,

New Delhi – 110057

Email: [bhide.pv@gmail.com](mailto:bhide.pv@gmail.com)

#### **(b) Employees**

TRL Krosaki employees can report their concern to;

#### **Ethics Counsellor**

**TRL Krosaki Refractories Limited**

At/PO: Belpahar, Dist.: Jharsuguda,

Odisha – 768218 (India)

Email: [ec@trlkrosaki.com](mailto:ec@trlkrosaki.com)

Phone No.: +91 6645 258325

#### **(c) Vendors**

The vendors of the Company can also report their concern to the Company's Ethics Counselor, as mentioned under (b) above.

## **4. Investigation and Disciplinary Action**

The Ethics Counsellor of the Company shall take effective steps to respond to any concern which has been reported to him. The person raising such concern will also be informed of the outcome of the investigation. In case detailed investigation needs to be conducted, the Ethics Counsellor shall initiate such investigation with the help of internal / external agency, as necessary and in strict confidence. The Ethics Counsellor, upon completion of the investigation, shall submit a detailed report based on the findings to the Managing Director for approving necessary disciplinary action, in consultation with Head of Human Resources. The latter shall complete the process of disciplinary action.

## **5. Managing Assurance**

### **5.1 Identity of the person reporting concern**

Anyone, who desires to report a concern, should preferably disclose his identity while reporting the concern. Such identification helps the investigation process. The identity of the complainant will be kept confidential and will be disclosed only if it becomes necessary for investigation purposes or in certain circumstances where it is legally required to be so disclosed.

### **5.2 No retaliation**

The Company assures that the person reporting concern in good faith, using any appropriate channel of communication as provided for in this policy, shall be protected from any kind of harassment by anyone in the Company & there shall be no retaliatory action against him / her. The Company has constituted a Whistle Blower Protection Committee to ensure the above.

However, in case, where concern is raised with deliberate and/or ill motive to tarnish the reputation of employee(s) and department(s) of the Company, the person raising such concern will undergo the investigation process and disciplinary action, as appropriate.

## **6. Report to Audit Committee**

A quarterly report will be submitted to the Audit Committee on the number of complaints received in the preceding quarter, action taken on the complaints and results of investigations, if carried out.

## **7. Retention of Documents**

All the documents in relation to concern received and gathered during investigations shall be kept by the Ethics Counsellor for a period of five years.

## **8. Amendment**

The Company reserves the right to amend / modify this policy in whole or part from time to time, as relevant and necessary.

This Policy shall come into effect from January 1, 2021 and supersedes previous Policy.

**Date: 01.01.2021**

**(P. B. Panda)**  
**Managing Director**