

WHISTLE BLOWING POLICY

SEARLE is committed to excellence in everything we do and promotes best corporate practices. We, at Searle, are also committed to provide access to its employees even all stakeholders for open communication. In line with this commitment, we have launched a platform under the umbrella of “Whistle Blowing Policy”. The core objective of this policy is to safeguard the interest of employees, organization as well as of all stakeholders.

Our whistle blowing policy is therefore, fundamental to the company’s professional integrity. In addition, it reinforces the value, the company places on staff to be honest and respected members of their individual professions. It provides a method of properly addressing bona fide concerns that individuals within the company might have, while also offering whistleblowers protection from victimization, harassment or disciplinary proceedings.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the company nor should it be used to reconsider any matters which have been investigated under the harassment, grievance or disciplinary policies and procedures.

What is whistle blowing?

Whistle blowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived wrongdoing. The company considers such wrongdoings to include:

- Misconduct/ offensive conduct or malpractice (from any employee or management)
- Misuse of official position
- Any other unethical or illegal activities (fraud or corruption)
- Breach of law or inappropriate actions (in conflict with general understanding of right and wrong)
- Potential infractions of the Searle’s code of conduct
- Health and safety risks to public or damage to environment
- Any form of abuse to clients or vendors

NB. Other procedures are available to employees e.g. the Grievance and Harassment procedure which relates to complaints about your own employment. This policy also does not replace other corporate complaints procedures.

What does this policy apply to?

This policy covers situations where an individual (the whistleblower) raises a concern about a risk, malpractice or wrongdoing that affects others such as clients, suppliers, other staff, the company or the public interest.

SEARLE

Aims of the policy:

- To make employees feel confident in raising concerns and to question and act upon concerns about practice. Also to provide avenue to raise concerns and receive feedback on any action taken.
- To ensure employee receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
- To reassure that employees will be protected from possible retaliation or victimization if they have a genuine disclosure in the public interest. .

Employees are often the first to realize that there is something seriously wrong with the organization. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or management. Whistle blowing therefore encourages and enables employees to raise serious concerns **within** the company rather than overlooking a problem or 'blowing the whistle' outside.

Who does this policy apply to?

Searle is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect, people who have any serious concerns, to come forward and voice them.

Whistle blowing policy applies to all permanent and contractual; full-time and part-time employees, (including those designated as temporary, outsourced, authorised volunteers, interns, trainees, contractors working on premises and labour union members). It also covers suppliers and those providing services under a contract with the organization in their own premises. Also if there is any non-executive board member and / or stake holder.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity (until absolutely necessary). If you self-disclose your identity, the organization no longer will be obligated to maintain your confidentiality. However, later or at an appropriate time of investigation or conclusion, you may need to come forward as a witness (depending on the situation).

This policy encourages you however to put your name to your concern whenever possible. Please note that while raising concern, you:

- must believe the disclosure of information is in public interest
- must believe it to be substantially true
- must not act maliciously or make false allegations
- must not seek any personal gain

SEARLE

Process for dealing with whistle blowing disclosures:

- I. All employees and stakeholders are strongly encouraged to report all such activities at contact number **03000-SEARLE (732753)** or simple email to **hotline@searlecompany.com**. The management of the company is committed to curb such issues and deal with strict confidentiality while, every effort will be made not to reveal the identity of the reporting individual. For employees, It is suggested to write your Employee ID # and contact number while communicating your concern(s) and in case of stakeholder, your name and contact number so that we could contact you for further correspondence.
- II. Any complaint/ disclosure made via phone line or email will be accessible to the Ethics Committee.
- III. In the first instance, any disclosure made, member of Ethics Committee assigned will listen and understand the concern and will decide on the appropriate course of action to resolve the matter. Action may include any approach; informal, internal investigation, independent inquiry or referral to Police and/or legal consultant (depending on the matter). It also includes the option to dismiss the concern.
- IV. The member receiving the disclosure will inform the whistleblower as acknowledgement and of the outcome or proceedings (*where this would not breach of confidentiality*). Other members will ensure that disclosures are dealt with properly as all disclosures will be recorded and shared with other Committee members.
- V. The person(s) against whom the allegations are placed will be told about the claims against them and any evidence supporting this. He will be allowed to respond before any action is taken after internal investigation.
- VI. **Possible outcomes after reporting a concern:**
 - a. There will be no adverse consequences for anyone who reports a whistle blowing concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith, may be subject to disciplinary action.
 - b. Procedure for resolution of whistle blowing will be addressed through the Ethics Committee like any other important and urgent ethical complaint launched. You may also procedures (document) of Ethics Committee and Ethics Charter which will be applicable for whistle blowing as well.
 - c. The member with agreement of panel will decide what further action shall be taken In the light of information available.
- VII. Brief record of the disclosure with outcome will be recorded and retained for 5 years with the Human Resources Department

SEARLE

Our commitment and safeguard of victimization

The Committee recognizes that the decision to report a concern can be a difficult one to make. If what is said is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you provide a service.

The Committee will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action to protect you when you raise a concern which is in the public interest.

If the policy or any point in policy is unclear or further queries, you may contact the HR Department and seek guidance.