



Whistle Blower Policy (V.1)

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Whistle Blower Policy

Objective:

The Company is committed to complying with the laws that apply to it, satisfying the Company's Code of Conduct, and particularly to assuring that business is conducted in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, both the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties. Consequentially, and to promote the highest ethical standards, the Company is committed to developing a culture where it is safe for all employees and affiliates to raise concerns about any unethical or unacceptable practice and any event of misconduct. The purpose of this policy is to provide a framework to promote responsible and secure raising of valid concerns. It aims to protect employees and affiliates wishing to raise a concern about serious irregularities within the Company.

Scope:

This policy is applicable to all employees of ServeAir SARL (hereafter referred as ServeAir), off-roll employees, customers and third party contractors / vendors.

Objective:

- To enable employees, customers and vendors to raise their concerns at an early stage without the fear of victimization, subsequent discrimination or disadvantage
- To check malpractices, misuse of Company' property and mismanagement or wrongful conduct prevailing in the Company
- To build and strengthen a culture of transparency and trust in the organization
- To minimize the financial, legal, reputational and other risks

Coverage:

Everyone is required to report to the Company, any suspected violation of any law that applies to the Company and any suspected violation of the Company's Code of Conduct and policies. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws. One should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action. The policy covers malpractices, any act of impropriety and abuse or wrongdoing by an employee or a group of employees, if employee / business associate in good faith believes and has evidence on any of the following (this is not a comprehensive list but is intended to illustrate the sort of issues that may be raised under this Policy)

Violation of any law or regulations, including but not limited to corruption, bribery, theft fraud, coercion and willful omission;

- Breach of contract
- Mismanagement, Gross Wastage or misappropriation of Company funds/assets;

- Manipulation of Company data/records/reports;
- Stealing cash/company assets; leaking confidential or propriety information;
- Activities violating Company's policies and process;
- A substantial and specific danger to employees' health and safety;
- An abuse of authority;
- An abuse of Brand Image of the Company;
- An act of discrimination, harassment and sexual harassment;
- Breach of employee Code of Conduct
- Any other unethical, biased, favoured, imprudent event;
- Deliberate concealment of information tending to show any of the above.

How to Report:

Any complaint or concern can be raised to managers, function head and HR head. Because one has several means of reporting, one need never report to someone one believes may be involved in the suspected violation or from whom one would fear retaliation.

The report should include as much information about the suspected violation as one can provide. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred.

Safeguards against Retaliation

The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower. Complete protection will, therefore, be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further disclosures. Following safeguards have been incorporated to ensure protection against retaliation

- The identity of the Subject and the Whistle Blower will be kept confidential to the extent possible given the legitimate needs of law and the investigation
- Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower
- If an Employee makes an allegation in good faith, which is not confirmed by subsequent investigation, no actions will be taken against that Employee, however allegations, which are proven as having been made maliciously or knowingly to be false, shall be viewed as a serious disciplinary offense.

Confidentiality:

The Whistle Blower, the Subject, and everyone involved in the process shall:

- Maintain complete confidentiality/ secrecy of the matter
- Not discuss the matter in any informal/social gatherings/ meetings
- Discuss only to the extent or with the persons required for the purpose of completing the process and investigations
- Not keep the papers unattended anywhere at any time
- Keep the electronic mails/files under password

Exception:

ServeAir reserves unconditional right to amend, abrogate, modify and / or rescind any of the provisions of this policy at any time. Exceptions to the policy will be handled on a case-to-case basis by the Management and HR Department.

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