



Crompton

VIGIL MECHANISM &
WHISTLE BLOWER POLICY

**CROMPTON GREAVES
CONSUMER ELECTRICALS
LIMITED**

**VIGIL MECHANISM &
WHISTLE BLOWER POLICY**

PRELUDE AND LEGAL FRAMEWORK

Crompton Greaves Consumer Electricals Limited (herein after referred as “Crompton” or “the Company”) being listed company requires to establish a vigil mechanism for directors and employees to report the genuine concerns as per the provisions of the section 177 of the Companies Act, 2013 and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 in such manner as may be prescribed.

In terms of Regulation 4(2)(d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”), it is mandatory requirement for all listed companies to devise an effective whistle blower mechanism enabling stakeholders, including individual employees and their representative bodies, to freely communicate their concerns about illegal or unethical practices.

Accordingly, a Vigil Mechanism and Whistle blower Policy (“the Policy”) has been formulated with a view to provide a mechanism for Directors and employees of the Company to report genuine concerns.

In addition to above the Company has also issued a “Whistle Blower Policy for Vendors” with reference to Clause 3 of Company’s Code of Conduct. The Policy provides for protection to the Whistle Blower vendor from any victimisation or other unfair practice by the Company.

Individuals may raise their concerns to GM & General Counsel - Legal or Chief Human Resources Officer or directly to the Chairman of the Audit Committee of the Company.

Chairman of the Audit Committee

“Crompton Greaves Consumer Electricals Limited”
05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

GM & General Counsel - Legal

“Crompton Greaves Consumer Electricals Limited”
05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

Chief Human Resources Officer (CHRO)

“Crompton Greaves Consumer Electricals Limited”
05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

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WHISTLE BLOWER POLICY FOR DIRECTORS & EMPLOYEES

1. DEFINITIONS

In this policy, unless the context otherwise requires, the terms defined herein shall bear the meanings assigned to them below, and their cognate expressions shall be construed accordingly.

“Act” means The Companies Act, 2013.

“Audit Committee” means a Committee constituted by the Board of Directors of the Company in accordance with regulations of SEBI (LODR) Regulation, 2015 and Companies Act, 2013.

“Board” means the Board of Directors of the Company.

“Code” means the Code of Conduct of the Company.

“Company/Crompton” means Crompton Greaves Consumer Electricals Limited;

“Directors” means Directors of the Company

“Employee” means every employee of the Company (whether working in India or abroad), including the directors in the employment of the Company.

“Key Managerial Personnel” (KMP) means:

- a. Chief Executive Officer and / or Managing Director
- b. Whole-time Director
- c. Chief Financial Officer
- d. Company Secretary
- e. Such other officer as may be prescribed

“Listing Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“Protected Disclosure” means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

“Reportable Matter” means a genuine concern concerning actual or suspected:

- a. fraudulent practices, such as improperly tampering with books and records, or theft of company property;
- b. corruption, including bribery and money laundering;
- c. breaches of the Code of Conduct.

Please note that complaints concerning personal grievances, such as professional development issues or Employee compensation, are not Reportable Matters for purposes of this Policy.

“Stakeholders” means and includes vendors, suppliers, lenders, customers, business associates, trainee and others with whom the Company has any financial or commercial dealings.

“Subject” means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation..

“Stock Exchanges” means BSE Limited and National Stock Exchange of India Limited.

“Whistle Blower” means an Employee or group of Employees or director making a Protected Disclosure under this Policy and also referred in this policy as complainant.

The words, terms and expressions referred to in this policy will have the same meaning as defined under the Companies Act, 2013 (the “Act”) and the rules made there under and the SEBI Listing Regulations including any statutory modification or re-enactment thereto, as the case may be.

In this Policy, unless the contrary intention appears:

- a) the clause headings are for ease of reference only and shall not be relevant to interpretation;
- b) a reference to a clause number includes a reference to its sub-clauses;
- c) words in singular number include the plural and vice versa.

2. APPLICABILITY & COVERAGE

Any employee can report a concern, but with the relevant evidence and in good faith, under this Policy. However, since reporting may result in an investigation affecting the privacy rights of an employee, it is expected that reportees act in a responsible manner in reporting what they feel are genuine cases (and not to settle personal agendas).

This Policy covers malpractices, any act of impropriety and abuse or wrongdoing by an employee or a group of employees, if any person in good faith believes and has evidence on any of the following:

1. Fraud and misconduct regarding financial and accounting matters;
2. Embezzlement/theft;
3. Falsification of contracts, complaints and records, including employment and education records;
4. Corruption;

5. Conflict of interest;
6. Misuse of Company's assets and resources;
7. Unfair treatment of Customers/Suppliers;
8. Securities related violations including insider trading;
9. Violation of anti-competition and anti-trust laws;
10. Misconduct regarding the protection of the environment or compromise of health & safety;
11. Sexual Harassment of any kind;
12. Unfair Employment practices;
13. Unlawful or in breach of any law; and
14. Instances of leakage of unpublished price sensitive information.

(This is not a comprehensive list but is intended to illustrate the sort of issues that may be raised under this Policy)

3. CUSTODIAN

The Company's Associate GM & General Counsel - Legal shall be the custodian of all the processes under this Policy. The GM & General Counsel - Legal will review merit for investigation and appoint authorities for investigation in terms of this Policy.

However, for all concerns and complaints related to Sexual harassment and Unfair Employment practices, the Company's CHRO will be the custodian of the process. CHRO will review merit for investigation and appoint authorities for investigation. All such complaints will be dealt in accordance with the 'Policy for Prevention of Sexual Harassment.'

4. MECHANISM FOR WHISTLE BLOWING

The concern/complaint can be reported through any of the following channels and in the manner as specified below:

1) E-Mail: For items mentioned at 2(1) to (10), (13) and (14) above, it can be reported by sending an e-mail to wbcrompton@crompton.co.in or in physical form in a sealed envelope marked as "Private and Confidential" to be sent to the below mentioned address:

AVP - Legal

"Crompton Greaves Consumer Electricals Limited"

05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

2) For items mentioned at 2(11) to (12) above, by sending an e-mail to posh.crompton@crompton.co.in or in physical form addressed to:

CHRO

“Crompton Greaves Consumer Electricals Limited”

05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

3) Toll Free Dial In – Hotline No. 1800-102-6969 is provided to Employees, Vendors, Associates, Consultants, Law Firms, to register Whistle Blower complaints.

4) If the complainant has a reason to believe that the GM & General Counsel - Legal or CHRO is or are involved in a suspected violation(s) as listed above, then the complaint may be made to the Chairman of the Audit Committee of the Company at:

Chairman of the Audit Committee

“Crompton Greaves Consumer Electricals Limited”

05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

5. ROLE OF COMPLAINANT

The complainant's role is of a reporter with reliable information. The complainants are not required or expected to act as investigators or finders of facts, nor will they determine the appropriate corrective or remedial action that is required in a given case.

Complainants must not act on their own in any investigative activities, nor will they have a right to participate in any investigation other than as requested by GM & General Counsel - Legal, CHRO (for HR related matters), the Audit Committee of the Company or the investigators. However, complainants could be invited to take part in the investigation.

It is expected that a complainant acts responsibly and must be conscious that a complaint about employees of the Company or any aspect in relation to Company may result in decisions that affect employees of the Company and other third parties involved in the relevant incident. Hence, it is essential, that complainants must provide only information that, to the best of their knowledge, is accurate and supported by evidence.

Whilst it will be ensured that genuine complainants receive complete protection from any kind of reprisal, complainants making malicious or frivolous complaints could have disciplinary and other actions taken against them. No reprisal or disciplinary action will be taken if the complaint made by the complainant is made in good faith or information provided by any employee during the investigation is in good faith, even if the reported facts turn out to be false.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the Committee shall take appropriate disciplinary or legal action against the concerned whistle blower.

6. PROCEDURE FOR HANDLING COMPLAINTS

If protected disclosure is received by any employee of the Company other than the AVP-Legal and VP-HR, the same should be forwarded immediately to the GM & General Counsel - Legal or CHRO for further appropriate action. Such employee should not disclose the identity of the Whistle Blower and appropriate care must be taken to keep the identity of the Whistle Blower confidential.

Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower.

Protected Disclosures should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.

The Company encourages and strongly recommends that the Whistle Blower discloses his/her name in the Protected Disclosure as it would not be possible to interview the Whistleblowers. However, when an anonymous Whistleblower provides specific and credible information that supports the complaint, such as alleged perpetrators, location and type of incident, names of other personnel aware of the issue, specific evidence, amounts involved etc. while choosing to maintain anonymity, then there are often sufficient grounds for the Company to consider an investigation into the complaint.

Upon receipt of a complaint of possible misconduct, investigations by GM & General Counsel - Legal or CHRO or Chairman of the Audit Committee, as the case may be, will be launched only after a preliminary review which establishes that :

(a) the alleged act could constitute an improper or unethical activity or misconduct, and

(b) the complaint is supported by information which is relevant, and specific enough to be investigated; or in cases where the allegation is not adequately supported by relevant and specific information, it is assessed by the GM & General Counsel - Legal or CHRO or Chairman of Audit Committee that the concerned matter is worthy of Management review.

Only after the preliminary review establishes that the complaint made, merits further investigation, then a Investigating Authority will be appointed.

The Investigating Authority will lead the investigation, with legal support provided by the Company's and/or external legal counsels/agencies.

7. PROCEDURE FOR INVESTIGATION

The above-mentioned Investigating Authority shall be required to pursue the following steps for the Investigation:

- (i) Obtain full details and clarifications of the complaint.
- (ii) If necessary, involve the Company's legal Counsels, Auditors and/or local law enforcement agencies and/or any other external investigation agency or person.
- (iii) Fully investigate into the allegation with the assistance from his team and other individuals/bodies indicated above, where appropriate, and come to a final decision in the matter within a maximum period of 45 days or such time as the local law may prescribe, from the date of receipt of the complaint, except where it is justified that the length of the investigation needs to be extended for a period of not more than 3 months.
- (iv) The conclusions must be presented to the Managing Director for formation of Management Committee for invoking disciplinary/other appropriate action against the employee, if so required based on the conclusion of the investigation.

Principles of investigation:

- (a) The Investigating Authority must ensure that any investigation proceeds on the assumption that the employee complained against is innocent until proved guilty.
- (b) It must be ensured that employees complained against are treated fairly and with due dignity in connection with investigations; and given a full hearing following the rules of natural justice.
- (c) The investigation must be a neutral fact-finding process.
- (d) All Investigators involved must act in an independent and unbiased manner, both in fact as well as perceived. Hence, investigators have both, a professional obligation and a duty to act with fairness, objectivity, thoroughness, ethical behaviour, and must display the highest professional standards.
- (e) Information to the complainant on the status of the investigation will be updated to the Managing Director.
- (f) The Company will not inform the complainant of the actual action that the Company takes in a particular case, since this would compromise the Company's confidentiality obligation towards the employee complained against.

- (g) In exceptional circumstances, GM & General Counsel - Legal shall provide direct access for the complainant, accused and others impacted by the complaint, to the Chairman of the Audit Committee of Crompton Greaves Consumer Electricals Limited.

8. MANAGEMENT COMMITTEE

A Management Committee as nominated by the Managing Director of the Company shall be formed upon completion of the investigation and requiring action by the Committee subject to the completion of the investigation process within the time prescribed under this policy and/or under applicable laws. This Committee shall be responsible for deciding the action to be taken against defaulting employees in consonance with the provisions of the Code. For matters related to Item 2(11) and 2(12), this Committee will be formed in consonance with the local law requirements on sexual harassment and unfair employment practices.

Decisions taken by the Management Committee and actions taken by the Company or exoneration cases will be informed by the Head of Internal Audit to the Audit Committee of the Company on a quarterly basis. Actions taken by the Management Committee will be implemented subject to applicable law(s).

9. CONFIDENTIALITY & DATA PROTECTION

The identity of the complainants will be kept confidential throughout the investigation process.

For the purpose of processing complaints, conducting of investigations and to initiate sanctions, Internal Audit may further share the personal data and information of the complainant with other internal departments of the Company, including external investigative agencies, legal counsels and law enforcement agencies for investigations, remedial actions and sanctions, as necessary.

The relevant bodies that receive and process personal data comprised in the complaint/concern and other investigation material can be located in various geographies that may have different levels of data protection. The Company shall endeavour that data transfers are adequately protected as per the local laws applicable to such geography.

The employee against whom a complaint has been made and which merits investigation will be notified immediately that a complaint has been filed and the details of the Investigating Authority undertaking the investigation of allegation(s) against him/her; except in cases where the ability of Company to investigate the allegation(s) or gather the necessary evidence is jeopardized by such notification. However the complainant's identity will not be disclosed. In case of unsubstantiated or malicious reporting, if the employee reported against wishes to pursue a case for defamation, the complainant's identity, if available with Company, may have to be disclosed to the employee, if permitted by law.

The complainant and the employee against whom the complaint has been made shall have the right to access personal data processed about them in connection with complaints and subsequent investigations. If a complainant or the employee against whom the complaint is made has any concerns or objections to the way information about them is being used in relation to this Policy, they are directed to contact the GM & General Counsel - Legal or CHRO, as the case may be. The GM & General Counsel - Legal or CHRO, as the case may be, also be contacted with requests for the correction or deletion of such information. Both, complainant and the employee against whom the complaint has been made may oppose the processing of information where there are justifiable grounds under applicable local law to do so.

The personal data provided along with the complaint will be retained in a controlled form, physically or electronically, by the appointed Investigating Authority to ensure confidentiality. Complaints which are unsubstantiated or provide insufficient information to undertake adequate investigation will be deleted after the expiry of 2 months from the closure of the preliminary review/investigation. Personal data relating to complaints which are adequately investigated or cases, in which legal proceedings or disciplinary actions are initiated, shall be deleted 2 months after the conclusion of proceedings or after the time for making an appeal under the law has elapsed, whichever is later.

10. ANONYMOUS COMPLAINTS

The Company encourages that complainants disclose their name when submitting a complaint. Many investigations can be more quickly and effectively completed when the complainant is identified because it allows Company's investigators to follow up directly with the complainant. However it is possible that a complainant may choose to remain anonymous. In case of anonymous reporting or under a fictitious identity/email id, the GM & General Counsel - Legal, in consultation with the Investigation Authority will take a decision whether there is sufficient evidence to merit further inquiry. Complaints that are ambiguous, unclear, provide inadequate information or which unfairly accuse the employee complained against will not be investigated further. Anonymous complaints will be considered only if they offer clinching evidence against the wrongdoing. Also, there will be no deliberate efforts taken to identify the complainant through forensic investigations, except in cases where the accusations are very serious and the Management Committee feels it is necessary to track and identify the anonymous complainant. In such cases, the identity and information of the anonymous complainant shall not be disclosed by the Investigating Authority, to other than the Management Committee or other external Agencies, as required by law; or to such persons authorized by the complainant.

11. RIGHTS AND OBLIGATIONS OF THE EMPLOYEE COMPLAINED AGAINST

The employee complained against:

- (i) Will, except in cases where the ability of the Company to investigate the allegation(s) or gather the necessary evidence is jeopardized by such notification, will be informed of the allegations, the Investigating Authority undertaking the investigation, the services and departments which will be informed of the report, after a preliminary review in terms of Item 6 determines that a formal investigation is required. The employee will have full opportunity to provide inputs during the investigation, to support his/her case.
- (ii) Shall have the duty to fully co-operate with the GM & General Counsel - Legal , CHRO and/or any of the investigators during investigation, to the extent that such co-operation will not compromise self-incrimination protections available under applicable laws.
- (iii) Shall have the right to discuss/consult/seek advice from any persons (including professional advisors) of their choice, in addition to GM & General Counsel - Legal , CHRO and/or the complainant. Such employees shall be free at any time to engage counsel at their own cost to represent them in the investigation proceedings.
- (iv) Shall have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coerced, threatened or intimidated by such employee.
- (v) Shall always be given the opportunity to respond to material findings contained in an investigation report (unless there are compelling reasons not to do so). No allegation of wrongdoing/misconduct against an employee shall be considered as maintainable, unless there is adequate objective evidence in support of the allegation.
- (vi) Shall have the right to be informed of the results of the investigation.
- (vii) Shall have the right of access, rectification and erasure of his/her personal data in accordance with applicable local law.
- (viii) May under applicable local law have a right to object in writing to the processing of his/her personal data.

12. PROTECTION

The Company assures that:

- The complainant will not suffer any detriment by any Company actions by virtue of his/her having reported a violation using a mechanism under this Policy (unless it is reasonably evident that the reporting was frivolous or malicious).

- The Company, as a policy, takes a serious view of any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against the complainant. Complete protection is, therefore, assured to complainants against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or similar actions including any direct or indirect use of authority to adversely impact the complainant's right to continue to perform his/her duties/functions including the complainant making further disclosures of concerns/misconduct. However, the Policy does not exonerate, override, reinstate or add to any other contractual rights/obligations that the complainant may have with the Company.
- The Company will take steps to minimize difficulties, which the complainant may experience as a result of reporting the violation. Hence, if the complainant is required to give evidence in any proceedings, the Company will arrange for the complainant to receive adequate professional advice in such situations; and also bear the costs.
- A complainant may intimate any non-fulfilment by the Company of its obligations mentioned above, to the Chairman of the Audit Committee, who shall investigate into the same; and recommend suitable action to the Management.
- Any other employee assisting in the said investigation shall also be protected to the same extent as the complainant.

13. ACTIONS BY MANAGEMENT COMMITTEE

If charges are substantiated, or the complaint is found correct on investigation, suitable action will be suggested. The following punitive actions could be taken against employees, where the Committee finds the accused guilty:

- a. Counselling and Warning letter;
- b. Withholding of promotion / increments;
- c. Bar from participating in bonus/incentive review cycle;
- d. Termination;
- e. Legal suit; and
- f. Any other action as may be deemed fit by the Committee.

The above are only suggestive and the Committee may decide on the actions to be taken on a case-to-case basis depending on the gravity of the offence.

14. REPORTING

The GM & General Counsel - Legal shall submit a report to the Chairman of the Audit Committee on a periodic basis, on all complaints referred to the Management Committee

with the status of investigations and actions taken by the Management Committee.

The details of the establishment of Vigil Mechanism, Whistleblower policy and affirmation that no personnel have been denied access to the Audit Committee will be stated in the section on Corporate Governance of the Annual Report of the Company.

15. EFFECTIVE DATE

This policy shall be effective from April 07, 2016, and as amended on January 29, 2019, March 27, 2019, May 15, 2020, February 2, 2023, and May 15, 2025.

16. RETENTION OF DOCUMENTS

All Protected disclosures in writing or documented along with the results of Investigation relating thereto, shall be retained by the Company for a period of minimum 7 (seven) years or such other period as specified by any other law in force, whichever is more.

17. ACTIONS FOR IMPLEMENTATION

- (a) This Policy is also explained on the Company's website www.crompton.co.in
- (b) It will be the sole responsibility of every Employee to adhere to this Policy.
- (c) All Human Resource Managers are requested to please:
 - (i) Keep a track of Employees joining and leaving; and include a copy of this Policy and Code in the Induction Kit of Employees joining at every Crompton location.
 - (ii) To achieve maximum dissemination of the Policy to all Employees, ensure that the Policy be sent to all Employees at their official email IDs; and also display a copy of the Policy on your Notice Boards and Bulletin Boards.

18. CONTACT PERSONNEL

For queries related to this policy, please write to us at: secretarial@crompton.co.in

19. LIMITATION AND AMENDMENT

The Board of Directors may in their discretion and on recommendation of any committee constituted thereof, make any changes/modifications and/or amendments to this Policy from time to time. In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over and automatically be applicable to this Policy and the relevant provisions of the Policy would be amended/modified in due course to make it consistent with the law.

WHISTLE BLOWER POLICY FOR VENDORS

In compliance with clause 3 of Crompton Greaves Consumer Electricals Limited's ("Crompton") Code of Conduct and in furtherance with its policy to encourage and protect genuine Whistle blowing by Vendors, a Vendors' Whistle Blower Policy ("Policy") has been developed.

1. DEFINITIONS

"Code" means the Code of Conduct of the Company.

"Company/ Crompton" means Crompton Greaves Consumer Electricals Limited.

"Directors" means Directors of the Company.

"Employee" means every employee of the Company (whether working in India or abroad), including the directors in the employment of the Company.

"Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity by any employee, Director or vendor.

"Reportable Matter" means a genuine concern concerning actual or suspected:

- a. fraudulent practices, such as improperly tampering with books and records, or theft of company property;
- b. corruption, including bribery and money laundering;
- c. breaches of the Code of Conduct.

"Subject" means the person against whom the complaint or protected disclosure, under this Policy has been made.

"Vendor Whistle blower" means any vendor with whom the Company has any association in the usual course of business making a protected disclosure and thereafter extending whatever assistance as may be required in establishing facts mentioned in the Protected Disclosure.

2. PROCEDURE

Protected Disclosures should preferably be reported in writing i.e. in ink or electronically- and should be factual (not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower and should be addressed to GM & General Counsel - Legal or Chairman of the Audit Committee.

Toll Free Dial In - Hotline No. 1800-102-6969 is provided to Employees, Vendors Associates, Consultants, Law Firms to register Whistle Blower complaints.

3. ANONYMOUS COMPLAINTS

The Company encourages that complainants disclose their name when submitting a complaint. Many investigations can be more quickly and effectively completed when the complainant is identified because it allows Company's investigators to follow up directly with the complainant. However, it is possible that a complainant may choose to remain anonymous. In case of anonymous reporting or under a fictitious identity/email id, the GM & General Counsel - Legal, in consultation with the Investigation Authority will take a decision whether there is sufficient evidence to merit further inquiry. Complaints that are ambiguous, unclear, provide inadequate information or which unfairly accuse the employee complained against will not be investigated further. Anonymous complaints will be considered only if they offer clinching evidence against the wrongdoing. Also, there will be no deliberate efforts taken to identify the complainant through forensic investigations, except in cases where the accusations are very serious and the Management Committee feels it is necessary to track and identify the anonymous complainant. In such cases, the identity and information of the anonymous complainant shall not be disclosed by the Investigating Authority, to other than the Management Committee or other external Agencies, as required by law; or to such persons authorized by the complainant.

The contact details of the Chairman of the Audit Committee and of the GM & General Counsel - Legal of the Company are as under:

Chairman of the Audit Committee

Crompton Greaves Consumer Electricals Limited
05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

GM & General Counsel - Legal

"Crompton Greaves Consumer Electricals Limited"
05GBD, Godrej Business District, Pirojshanagar,
Vikhroli (West), Mumbai 400079, Maharashtra, India

4. PROTECTION TO THE WHISTLE BLOWER

The Company as a policy, condemns any kind of discrimination, harassment, victimisation or any other unfair practice being adopted against the Vendor Whistle Blowers while conducting business with the Company.

The Vendor Whistle blower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/orders, refusal from issuance of 'RFQ (Request For Quotation)' to them, or any direct or indirect use of authority to obstruct the Vendor Whistle blower from continuing to execute their jobs, including making further Protected Disclosures.

Should, in spite of best efforts by the Company, the identity of the Vendor Whistle blower become known during the investigation, the Chief Procurement and the Chief/ Head of the concerned user departments, shall ensure that the Vendor Whistle blower, is provided with all the assistance required to execute existing orders.

Under no circumstances, subjects against whom the disclosures have been made should compel investigator to disclose the identity of the Vendor Whistle blower.

In case a Vendor Whistle blower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the GM & General Counsel - Legal, giving specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Committee for their examination. The Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

5. DISQUALIFICATIONS

Any abuse of this protection by vendors will warrant disciplinary action.

6. AMENDMENT

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

7. NOTIFICATION OF THIS POLICY

The Chief Procurement Officer shall ensure that an approved copy of this Policy and its subsequent amendments if any, are notified in writing/via email, to all the vendors engaged by the Company.

8. EFFECTIVE DATE

This policy shall be effective from April 07, 2016 and as amended on January 29, 2019, March 27, 2019, May 15, 2020, February 2, 2023 and May 15, 2025.