



CIRC/MAY/16/01

12 MAY 2016

WHISTLE BLOWER POLICY FOR BUSINESS ASSOCIATES

In furtherance with Tata Metaliks Limited's ("Company") policy to encourage and protect genuine Whistleblowing by Business Associates, a Business Associates Whistleblowing Protection Policy ("Policy") has been developed.

Definitions:

"Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith and which discloses information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature, by any Employee, Director or Business Associates

"Business Associates Whistleblower" means a person/organization registered in the Business Associates data base of the Company, making a Protected Disclosure and thereafter extending whatever assistance may be required in establishing facts mentioned in the Protected Disclosure.

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.
- Misconduct concerning the Ethics Counsellor and employees at the levels of Vice President and above, should be addressed to the Chairperson of the Audit Committee of the Company and those concerning other employees, should be addressed to the Ethics Counsellor of the Company.
- The Whistleblower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistleblowers.
- The contact details of the Chairperson of the Audit Committee and of the Ethics Counsellor of the Company are as under :

Chairperson of the Audit Committee :

Mr. Krishnava Dutt,
Argus Partners
Solicitors & Advocates
11B Nirmal Building,
11th Floor, Nariman Point,
Mumbai 400021

Ethics Counsellor :

Dr. Ratna Sinha, Ethics Counsellor, Tata Metaliks Ltd.
E-mail: ratna.sinha@tatametaliks.co.in

Protection to the "Business Associates Whistleblower"

- The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the "Business Associates Whistleblower" while conducting business with the Company.
- The "Business Associates Whistleblower" 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,

TATA METALIKS LIMITED

Tata Centre 43 Jawaharlal Nehru Road Kolkata 700 071 India
Tel 91 33 66134205 Fax 91 33 2288 4372 e-mail tml@tatametaliks.co.in
CIN L27310WB1990PLC050000



or any direct or indirect use of authority to obstruct the Business Associates Whistleblower from continuing to execute their jobs, including making further Protected Disclosures.

Should, in spite of best efforts by the Company, the identity of the Business Associates Whistleblower become known during the investigation, the Chief Procurement and the Chief/ Head of the concerned user departments, shall ensure that the "Business Associates Whistleblower", 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 Business Associates Whistleblower.

Disqualifications:

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

"Business Associates Whistleblower" Protection Committee:

The Company has constituted the "Business Associates Whistleblower" Protection Committee ("the Committee"). In case a "Business Associates Whistleblower" feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the Ethics Counsellor, 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.

Sanjiv Paul, MD - Chairman
Saikat Dutta, Chief (Corporate Audit) - Member
Sanjoy Guha, Chief (Procurement) - Member
Ratna Sinha, Ethics Counsellor - Convener

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.

Notification to this Policy:

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

(SANJIV PAUL)
MD-Tata Metaliks Limited
&
Chairman – Tata Metaliks DI Pipes Ltd.

CC : MD's Office
: All (KGP & KOL)
: HRM

TATA METALIKS LIMITED

Vill Mahespur PO Samraipur PS Kharagpur Local Paschim Mednipur 721 301 WB India
Tel 91 3222 233290 234424 Fax 91 3222 233316 e-mail tml@tatametaliiks.co.in
Registered Office Tata Centre 43 Jawaharlal Nehru Road Kolkata 700 071
CIN L27310WB1990PLC050000