



**WHISTLEBLOWER POLICY**  
**T.C. TERRYTEX LIMITED**



#### **A. OBJECTIVE:**

- The Company is committed to conducting its affairs in a fair and transparent manner, adhering to the highest standards of professionalism, honesty, integrity, and ethical behavior. In this regard, the Company has adopted a Code of Conduct (“the Code”), which sets forth the principles and standards governing the actions of the Company and its employees. Any actual or perceived violation of the Code, no matter how minor it may seem, will be treated as a matter of serious concern.
- The Company is dedicated to adhering to the highest ethical, moral, and legal standards in its business operations. To maintain these standards, the Company encourages stakeholders to come forward and express concerns regarding suspected misconduct, without fear of punishment or unfair treatment. This policy provides an avenue for stakeholders to report violations of law, unethical practices, or any suspected leakage of unpublished price-sensitive information that could lead to financial loss or reputational risk for the Company.
- The Management assures cooperation in safeguarding the interests of those individuals who report matters of concern. This protection is reinforced by the Whistle Blower Policy, ensuring that the policy is not misused.\
- This policy does not address issues related to dissatisfaction with appraisals, rewards, company policies, service conditions, improvement suggestions, or gender harassment, as there are separate channels prescribed for such matters.

#### **B. SCOPE:**

1. All employees and directors of the Company are eligible to make Protected Disclosures under this Policy. These disclosures may relate to any matters concerning the Company.
2. Employees and Directors will be assured protection from reprisals or victimization if they report concerns in good faith.
3. The policy covers malpractices and events that have occurred or are suspected to occur, including but not limited to:
  - a. Abuse of authority
  - b. Breach of contract or law
  - c. Manipulation of company data or records
  - d. Criminal offenses
  - e. Unethical behavior, improper code of conduct, or suspected fraud

#### **C. DISQUALIFICATIONS:**

1. Genuine whistleblowers will be protected from unfair treatment. However, any misuse of this protection will result in disciplinary action.
2. Protection under this policy does not cover those making false or malicious allegations.
3. Whistleblowers whose disclosures are found to be mala fide, frivolous, or malicious will be liable for prosecution as per the Company's existing policies.



## **D. MECHANISM OF THE POLICY:**

### **I. RAISING A CONCERN:**

- a. The whistleblowing mechanism should be used for potentially serious or sensitive issues.
- b. The complainant should provide the background and history of the concern, including names, dates, and locations where possible. The reasons for the concern should also be clearly stated. If the complainant is unable to submit the concern in writing, they may communicate it by telephone or in person to the appropriate officer.
- c. The complainant is not required to prove the truth of the allegations but must provide sufficient grounds for concern. Employees should raise concerns as soon as possible, which will aid the investigation process and enable faster implementation of corrective actions, if necessary.
- d. The Company Secretary is available for advice and guidance on how to raise concerns.
- e. Concerns should be raised preferably in writing to Mr. Tanuj Gaba , Chairman of the Audit Committee.

### **II. PROCEDURE:**

- a. Upon receiving a concern, an initial inquiry will be conducted to determine whether an investigation is necessary and, if so, what form it should take. Some concerns may be resolved by an agreed action without requiring a formal investigation.
- b. Once the concern has been evaluated, the Company will write to the complainant to:
  - i. Acknowledge receipt of the concern;
  - ii. Outline how it will be addressed;
  - iii. Inform the complainant if further investigations will take place or explain why no further action is required.
- c. The level of contact between the investigating body and the complainant will depend on the nature of the matter raised, the complexities involved, and the clarity of the provided information. Further information may be sought if necessary.
- d. The Company will take steps to protect the whistleblower from victimization and minimize any difficulties resulting from raising a concern.
- e. The Company will ensure that the concern is appropriately addressed and will take necessary actions to reassure the whistleblower that the matter is being dealt with.

### **E. SAFEGUARDS/PRESERVATION:**

The Company strongly condemns any form of discrimination, harassment, victimization, or any unfair employment practice against whistleblowers. Complete protection will be provided to whistleblowers against any retaliation, threats, intimidation, suspension, demotion, refusal of promotion, discrimination, harassment, or biased behavior. Any attempt to obstruct a whistleblower's ability to continue performing their duties, including making further protected disclosures, will be considered a serious violation. The Company will take all necessary steps to minimize any difficulties the whistleblower may experience as a result of raising the concern. If the whistleblower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the provision of advice regarding the process.



The identity of the whistleblower will remain confidential. Any employee assisting in the investigation or providing evidence will also be protected to the same extent as the whistleblower.

#### **F. SECRECY:**

The Company will make every effort to protect the identity of the whistleblower. However, it must be understood that a statement from the whistleblower may be required as part of the evidence in the investigation process.

#### **G. REPORTING:**

A quarterly report detailing the number of complaints received under the Policy and their outcomes will be submitted to the Audit Committee and the Board of Directors.

#### **H. AMENDMENT:**

The Company reserves the right to amend or modify this policy at any time without providing a reason. However, no amendment or modification will be binding unless it is communicated to employees in writing.

#### **I. CONTACT DETAILS:**

For any communication, please contact:

**Mr. Tanuj Gaba**  
Chairman of the Audit Committee  
Email: [catanujgaba@gmail.com](mailto:catanujgaba@gmail.com)