

GGL Whistle Blower Policy

GGL's Business Principles set high standards of conduct for its employees, contractors and suppliers. The company believes that it is crucial that these principles be followed in order to ensure business success.

1. Purpose, Scope and Guiding Principles

GGL wants to know about any breach or potential breach of its Business Principles, unlawful conduct, financial malpractice or dangers to the public, the environment, or to anyone working for GGL, that may be occurring despite the rigorous compliance procedures of the company. GGL's employees therefore have a duty to inform promptly if they have any reason to suspect that there has been a breach or potential breach of the Business Principles or any other misconduct. If an issue is raised internally first, and acted upon, it is likely to reduce any damage that may otherwise occur. Reporting of issues will detect and possibly deter any further wrongdoing.

This Policy explains how employees and any other individual or organization should report their concerns, the types of issues that are covered by the Policy and guidance on how individuals can seek assistance when they have a concern.

GGL will not tolerate retaliation against any employee who in good faith seeks advice, raises a concern or reports misconduct.

The fraud officer is responsible for investigating concerns raised under this Policy, who reports to the Audit Committee for this purpose. The Audit Committee has responsibility for keeping the Policy under review and amending it as necessary.

All concerns raised under the Policy will be monitored to ensure that the company takes appropriate action to redress any issues.

2. Scope

The Whistle Blower Policy applies to all employees of GGL as well as any employee working for entities and third parties such as contractors and agency workers.

The duty to report concerns applies to all employees of GGL. To fulfill this duty, employees must provide as much information as possible to ensure that a proper investigation can be carried out and must respond to requests for further information as the investigation progresses.

Depending on the terms of their contracts, the employees working for entities and third parties such as contractors and agency workers will also have a duty to report concerns under this Policy. Where there is no such contractual obligation,

GGL Whistle Blower Policy

third party workers are encouraged to use this Policy and bring their concerns about GGL or anyone acting on our behalf to our attention.

Any other individual or organization such as supplier or family member can also use this Policy to report concerns regarding the conduct of GGL or anyone action on our behalf. Such openness can help information reach the management which may otherwise go unnoticed, for example bribery or exploitation of gifts and hospitality.

Details of this Policy can be found on the GGL website.

3. Raising concerns – where to go for help

Line management is the first place for concerns to be raised as managers will generally be closest to the situation and best able to help. If fraud is suspected intimation can be sent to the Fraud Officer. His contact details are:

Mr. Nitesh Bhandari
Head – Finance
Gujarat Gas Limited
2, Shantisadan Society
Near Parimal Garden, Ellisbridge
Ahmedabad – 380006
Phone: 079-26462980
E-mail: nitesh.bhandari@gujaratgas.com

If a person is unsure about reporting the issue to the Line Manager, Group Head or Fraud Officer; he can report it to the CEO. His contact details are:

Mr. PPG Sarma
CEO
Gujarat Gas Limited
2, Shantisadan Society
Near Parimal Garden, Ellisbridge
Ahmedabad – 380006.
Phone: 079-26462980
E-mail: PPGSarma@GUJARATGAS.com

GGL Whistle Blower Policy

4. Access to the Audit Committee

In the extra ordinary circumstances where a person feels that he/she is not able to communicate his/her concern to the Fraud Officer or CEO, he/she has the option to address his/her concern to the Chairman of GGL's Audit Committee. His contact details are:

Mr. Jal Patel
Chairman-GGL Audit Committee and Independent Director
3, Green Park,
Tandalja Road
Vadodara-390 020.

5. Facility of Anonymous E-mail

GGL offers a facility where a person can send an e-mail to the CEO or to the Chairman of the Audit Committee, without disclosing his/her identity, if one chooses not to.

Persons other than employees can access the following link using Internet Explorer browser:

For employees	http://10.162.185.50/whistle.asp
For others	Visit our website http://www.gujaratgas.com Section Corporate Governance / Blow Whistle Online

The site would display the following options:
For e-mail to the CEO
For e-mail to the Chairman of the Audit Committee

The whistler needs to choose any one of the options by clicking on the link.

This would generate an anonymous e-mail as shown at the end of the policy document. Details of malpractice(s) observed are to be filled in. E-mail address is to be given if feedback is desired.

GGL Whistle Blower Policy

6. Format of e-mail

Blow a Whistle

E-mail to the CEO

To,
The CEO
Gujarat Gas Limited

Subject: (e.g. complaint, grievance, feedback, etc.)

-Enter message (upto 500 characters)

Do you want a feedback? (please replace whistler@gujaratgas.com with your email ID)

whistler@gujaratgas.com

E-mail to the Chairman of the Audit Committee

To,
The Chairman
Audit Committee
Gujarat Gas Limited

Subject: (e.g. complaint, grievance, feedback, etc.)

-Enter message (upto 500 characters)

Do you want a feedback? (please replace whistler@gujaratgas.com with your email ID)

whistler@gujaratgas.com
