

Whistle Blower Policy

1. Objective

- a) 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.

2. Definition

NA

3. Scope:

- a) The Whistle Blower Policy applies to all employees of GGL as well as any entities and third parties such as contractors and agency including their employees & workers.
- b) 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.
- c) Depending on the terms of their contracts, the employees working for entities and third parties such as contractors and agency including their employees & workers will also have a duty to report concerns under this Policy. Where there is no such contractual obligation, third party workers are encouraged to use this Policy and bring their concerns about GGL or anyone acting on our behalf to our attention.
- d) 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.
- e) Details of this Policy can be found on the GGL website.

4. Guidelines:

- a) 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

Policy and Process Owner- Human Resource Department

reduce any damage that may otherwise occur. Reporting of issues will detect and possibly deter any further wrongdoing.

- b) 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.
- c) GGL will not tolerate retaliation against any employee who in good faith seeks advice, raises a concern or reports misconduct.
- d) 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.
- e) All concerns raised under the Policy will be monitored to ensure that the company takes appropriate action to redress any issues.
- f) **Raising concerns – where to go for help:**
 - a) 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
CFO
Gujarat Gas Limited
2, Shantisadan Society
Near Parimal Garden, Ellisbridge
Ahmedabad – 380006
Phone: 079-26462980
E-mail: nitesh.bhandari@gujaratgas.com

g) **Access to the Audit Committee**

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

Chairman-GGL Audit Committee and Independent Director
Gujarat Gas Limited
2, Shantisadan Society
Near Parimal Garden, Ellisbridge
Ahmedabad – 380006
Phone: 079-26462980

h) Facility of Anonymous Communication

- a) GGL offers a facility where a person can send an e-mail to the CFO or to the Chairman of the Audit Committee, without disclosing his/her identity, if one chooses not to.
- b) Persons other than employees can access the following link using Internet Explorer browser:

For Employees	Visit Intranet
For Others	E-mail: nitesh.bhandari@gujaratgas.com

5. The above terms are subject to modifications / amendments / alterations by the management at any time depending on business requirements. In case of any doubt, the interpretation of the above terms by Head - HR & Admin. Department shall be final.

6. List of References / Annexures / Format:

Annexure I: Format for Communication

7. Policy Review:

In case the Policy is required to be amended due to any change in the regulatory requirement or due to any other reasons, the Policy shall be appropriately modified with the approval of the Managing Director of the Company.

8. Dissemination of Policy:

This policy will be uploaded on the website of the company and internally shared with all the relevant stakeholders.

Format No: HR/PM/WB/00

Annexure I
Format for Communication

Blow a Whistle

E-mail to the CFO

To,
The CFO,
Gujarat Gas Limited.

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

Enter message (upto 500 characters)

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)
