



WHISTLEBLOWER POLICY FOR BUSINESS ASSOCIATES

In compliance with Tata Code of Conduct, Tata Steel Business Delivery Centre Limited (TSBDCL) (“the Company”) has developed Business Associates’ Whistleblowing Protection Policy (“Policy”).

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 Associate.

“**Business Associate Whistleblower**” means a person/organization registered in the vendor 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 Senior Management and above of the Company, should be addressed to the Nominated Director 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 Nominated Director, Ethics Counsellor of TSBDCL are as under:

Nominated Director

Name: Mr. Ranjan Kumar Sinha

Contact Address: Commercial Centre, General Office, 1st Floor, Tata Steel Limited, Jamshedpur - 831001

Email Id: ranjan.sinha@tatasteel.com

Ethics Counsellor:

Name: Rajendra Pathak

Contact Address: Tata Centre 4th floor, 43 Jawahar Lal Nehru Road, Kolkata – 700071.

Email Id: rajendra.pathak@tatasteel.com



TATA STEEL BUSINESS DELIVERY CENTRE

Protection to the Business Associate Whistleblower:

- The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Business Associate Whistleblowers while conducting business with the Company.
- The Business Associate 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, or any direct or indirect use of authority to obstruct the Business Associate 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 Associate Whistleblower become known during the investigation, Head of the concerned user departments, shall ensure that the Business Associate 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 Associate Whistleblower.

Disqualifications:

Any abuse of this protection by Business Associates will warrant disciplinary action.

Business Associate Whistle Blower Protection

The company has constituted the Ethics Committee. In case a Business Associate 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 Ethics committee. The Ethics Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

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.

Sudeep Mishra

Sudeep Mishra
Managing Director