



SANCO TRANS LIMITED

WHISTLE BLOWER POLICY

1. Objective

This policy is formulated to provide a mechanism to employees to access the Audit Committee of the Company and disclose unethical and improper practices or any other alleged wrongful conduct in the Company as also to prohibit managerial personnel from taking any adverse personnel action against those employees.

2. Applicability

This policy applies to all permanent employees of the Company.

3. Scope of Policy

The policy covers following information on suspected unethical and improper practices or wrongful conduct, which employees, in good faith, believe exist:

- a. Manipulation of Company data / records
- b. A substantial and specific danger to public health and safety
- c. An abuse of authority
- d. Leaking confidential or proprietary information
- e. Violation of any law or regulations
- f. Gross wastage or misappropriation of company funds / assets
- g. Activities violating policies including Code of Ethics and Conduct

The above list is only illustrative and not exhaustive.

4. Procedures

- a. Any employee who becomes aware of any unethical and improper practice or alleged wrongful conduct can make a disclosure in writing to the Chairman of the Audit Committee, Sanco Trans Limited, New No.114 (Old No.248), Royapettah High Road, Royapettah, Chennai - 600 014 in a sealed cover and furnish as much details and evidence as possible, giving his name and CC no.
- b. The Audit Committee shall expeditiously investigate, as necessary, all such reports received.
- c. The Audit Committee shall have right to call for any information / document and examination of any employee of the Company or other person(s) as may be deemed appropriate for the purpose of conducting investigation under this policy.

- d. After considering the report, the Audit Committee shall determine the course of action and remedies which may, inter alia, include:
 - i. Revision of the policies and procedures of the Company to reduce the risk of recurrence.
 - ii. Action against persons concerned
- e. In all the cases, the decision of the Audit Committee shall be final.

5. Protection

- a. No action by way of discrimination, harassment, victimization or any other unfair employment practice like threat or intimidation or termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like will be adopted against Whistle Blowers.
- b. A Whistle Blower may report any such instances to the Audit Committee, which shall investigate and recommend suitable action to the management.

6. Anonymous Allegations

No anonymous / pseudonymous allegation will be entertained.

7. Confidentiality

The Company will treat all disclosures in a sensitive manner and will endeavour to keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.

8. Untrue / Malicious / Vexatious Allegations

If an individual makes an allegation, which is not confirmed by subsequent investigation and the investigation shows that an individual has made malicious or vexatious allegations for personal leverage, and particularly if he or she persists with making them, disciplinary action may be taken against the individual concerned.

Pseudonymous allegations will attract disciplinary action against the initiators of the report.