

Purpose:

This policy aims to encourage employees, contractors, and other stakeholders to report any suspected unethical, illegal, or inappropriate behaviour without fear of retaliation. It establishes clear procedures for reporting, investigating, and addressing such concerns.

Scope:

This policy applies to all employees, contractors, suppliers, consultants, and other stakeholders who are associated with the organization.

Key Principles:

1. Confidentiality:

- All whistleblower reports will be handled with strict confidentiality to protect the identity of the reporting individual (whistleblower).

2. No Retaliation:

- The organization prohibits retaliation against individuals who report concerns in good faith, even if the concerns are not substantiated after investigation.

3. Good Faith Reporting:

- Whistleblowers are expected to report concerns based on reasonable belief and evidence. False or malicious allegations will not be tolerated.

4. Reportable Matters: The following types of concerns should be reported under this policy

- Financial misconduct, fraud, or theft.
- Corruption, bribery, or unethical practices.
- Violations of company policies or legal obligations.
- Health and safety violations.
- Discrimination, harassment, or abuse of any kind.
- Environmental or social violations affecting stakeholders.
- Any other misconduct that could harm the organization, employees, or stakeholders.

Reporting Mechanisms:

1. Internal Reporting: Concerns can be reported through the following channels

- a. **Email:** Whistleblower@solwave-pv.com
- b. **Phone:** +91 8733936132
- c. **In-Person:** Directly to the Whistleblower Officer or designated personnel.

2. Anonymous Reporting:

- a. If the whistleblower wishes to remain anonymous, concerns can still be reported through the above email or phone contact, with explicit instructions to maintain anonymity.

Investigation Process:

- **Acknowledgment**
 - The organization will acknowledge receipt of the report within 5 working days.
- **Assessment**
 - The Whistleblower Officer or Committee will assess the validity and severity of the concern to determine next steps.
- **Investigation**
 - A thorough and impartial investigation will be conducted. The scope may include reviewing evidence, interviewing witnesses, and consulting legal or subject matter experts.
- **Outcome**
 - Upon conclusion, appropriate actions will be taken, which may include disciplinary measures, policy changes, or legal proceedings.
- **Feedback**
 - Where appropriate, the whistleblower will be informed of the outcome of the investigation.

Protection Against Retaliation:

1. **Non-Retaliation Guarantee:**
 - Employees or stakeholders who report concerns in good faith are protected from dismissal, demotion, harassment, or any form of retaliation.
2. **Disciplinary Actions for Retaliation:**
 - Retaliation against whistleblowers will result in strict disciplinary action, up to and including termination.

Responsibilities:

1. **Whistleblower Officer/Committee:** Oversee the whistleblower program and ensure timely investigation and resolution of reported concerns.
2. **Management:** Foster a culture of transparency and ethical behaviour while protecting whistleblowers from retaliation.
3. **Employees and Stakeholders:** Report any unethical or illegal activities promptly and in good faith.

False Allegations:

- Reporting concerns with malicious intent or false allegations is strictly prohibited and may result in disciplinary action.

Date: 01-April-2024

A purple circular stamp with the text 'SOLWAVE PV TECHNOLOGY GUJARAT' around the perimeter. A handwritten signature in blue ink is written over the stamp.

Approved by: Harshal Sheth