



GSPL Transmission Limited

Policy on Whistle Blower



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1. Objective

This Policy explains how any Individual or an 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. Scope:

- a. The Whistle Blower Policy applies to all individuals or organization related with GTL as well as any entities and third parties such as contractors and agency including their employees & workers.
- b. Depending on the terms of their contracts, the 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 GTL or anyone acting on our behalf to our attention.
- c. Any other individual or organization such as supplier or family member can also use this Policy to report concerns regarding the conduct of GTL 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.
- d. Details of this Policy can be found on the GTL website.

3. Guidelines:

- a. GTL 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 GTL, that may be occurring despite the rigorous compliance procedures of the company.
- b. GTL's Business Principles set high standards of conduct for its contractors and suppliers. The company believes that it is crucial that these principles be followed in order to ensure business success.



- c. The Fraud Prevention 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.
- d. All concerns raised under the Policy will be monitored to ensure that the company takes appropriate action to redress any issues.

e. Raising concerns – where to go for help:

- i. 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 Prevention Officer”. Contact details are:

Shri Lokesh Agarwal,

CFO

GSPL Transmission Limited GSPC Bhavan, Behind Udhog Bhavan,

Sector – 11 Gandhinagar-382 010, Gujarat, INDIA.

Tel: 079-23268613

E-mail: lokesh.agarwal@gspltrans.com

- ii. **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 Prevention Officer”, he/she has the option to address his/her concern to the Chairman of GTL’s Audit Committee. Contact details are:

Chairman-GTL Audit Committee and Independent Director

GSPL Transmission Limited

GSPC Bhavan, Behind Udhog Bhavan,

Sector – 11, Gandhinagar-382 010, Gujarat, INDIA.

- 4. The above terms are subject to modifications / amendments / alterations by the management at any time depending on business requirements.



5. List of References / Annexures / Format:

Annexure I: Format for Communication

Format No: HR/PM/WB/00

Annexure I **Format for Communication**

Blow a Whistle

E-mail to the CFO

To,
The CFO,
GSPL Transmission Limited.

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

Enter message (upto 500 characters)

Chairman of the Audit Committee

To,
The Chairman,
Audit Committee,
GSPL Transmission Limited

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

Enter message (upto 500 characters)
