

## **WHISTLEBLOWING POLICY**

### **Complaint and Investigation Procedures for Accounting, Internal Accounting Controls, Fraud or Auditing Matters**

The following procedures have been adopted by the Audit Committee of Bharat Aluminium Company Limited (the 'Company') to govern the receipt, retention, and treatment of Complaints and to protect the confidentiality and anonymity of the stakeholders / employees / cases reported. These policies and procedures apply to and are available to all employees of the Company and all external stakeholders.

#### **1 POLICY**

### **WHISTLEBLOWING POLICY**

#### **Complaints and the Investigation Procedures**

The following procedures have been adopted by the Audit Committee of Bharat Aluminium Company Limited (the 'Company') to govern the receipt, retention, and treatment of Complaints and to protect the confidential, anonymous reporting of the same. These policies and procedures apply to and are available to all employees of the Company and its subsidiaries.

#### **I. POLICY**

Employees have the opportunity to submit / report 'Complaints' pertaining to the following areas such as:

- a) Fraud (an act of willful misrepresentation which would affect the interests of the concerned) against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to the Securities and Exchange Board of India (the 'SEBI'), the U.S. Securities and Exchange Commission (the 'SEC'), the relevant stock exchanges, any other relevant authority or members of the investing public.
- b) Violations of any rules and regulations applicable to the Company and related to accounting and auditing matters.
- c) Intentional error or fraud in the preparation, review or audit of any financial statement of the Company.
- d) Any violations to the Company's ethical business practices as specified in the Company's Code of Conduct policy.
- e) Any other event which would affect the interests of the business.

The Company will protect the confidentiality and anonymity of the complainant to the fullest extent possible with an objective to conduct an adequate review. External stakeholders such as vendors, customers, business partners etc. have the opportunity to submit 'Complaints'; however, the Company is not obligated to keep 'Complaints' from non-employees confidential or to maintain the anonymity of non-employees. We encourage individuals sending 'Complaints' / raising any matter to identify themselves instead of sending anonymous 'Complaints' as it will assist in an effective complaint review process. Post review, if the complaint is found to be have been made with *mala fide* intention, stringent action will be taken against the complainant. We encourage employees to report genuine 'Complaints' and those submitted in true faith.

#### **PROCEDURES**

##### **Receipts of 'Complaints'**

All the 'Complaints' under this policy should be reported to the Group Head - Management Assurance, who is independent of operating management and businesses.

The contact details are as follows:

**Group Head – Management Assurance,**

Vedanta, 75 Nehru Road

Vile Parle (E), Mumbai 400 099

Tel No. +91- 22 - 66461000

Fax No. +91- 22 – 66461450

'Complaints' can also be sent to the designated E-mail ID: [balco.whistleblower@vedanta.co.in](mailto:balco.whistleblower@vedanta.co.in) the custodian of which is Group Head – Management Assurance. If a complaint is received by any other executive of the company, the same should be forwarded to the Group Head – Management Assurance at the above address.

### **Treatment of Complaints**

1. Group Head - Management Assurance shall review the Complaint. Investigations may be carried out either by the MAS team or any other external agency / legal counsel or any company employee(s) as the Group Head – Management Assurance may feel appropriate. The investigation team will submit their findings or recommendations to the Group Head – Management Assurance.
2. Once every six months and whenever else as deemed necessary, Group Head - Management Assurance shall submit a report to the Audit Committee that summarizes the number of 'Complaints' received and status of actions taken.

### **Access to Reports and Records and Disclosure of Investigation Results**

All reports and records associated with 'Complaints' are considered confidential information and access will be restricted to members of the Audit Committee, Group Head – Management Assurance and any other person as permitted by the Group Head – Management Assurance. 'Complaints' and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at that time.

### **Retention of Records**

All documents relating to such 'Complaints' made through the procedures outlined above shall be retained for at least five years from the date of the 'Complaint', after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case the information will be retained for the duration of that litigation, inquiry, or investigation and therefore as necessary.

### **Amendment to the Policy**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever and the same will be posted on the company website.