



N. Ranga Rao & Sons Private Limited

CIN U74900KA2014PTC077891

Registered Office: No.1553, Vanivilas Road, Mysore - 570 004, Karnataka, India

Phone : +91-821-2521227 Fax : +91-821-2520350

e-mail : info@nrrs.net, website: www.cycle.in



NRR/HR/26-06-02/2018-19

26TH Jun 2018

WHISTLE-BLOWER POLICY (“Policy”)

1. Objective

N. Ranga Rao & Sons Pvt. Ltd (hereinafter referred to as “**Company**”) is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. The Company believes in the conduct of affairs in a fair and transparent manner by adopting highest standards of honesty, integrity and ethical behaviour. To maintain these standards, the Company encourages its employees who have concerns about suspected malpractices/misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

2. Scope

This Policy will enable the employees to make Protected Disclosure with respect to issues covered under this Policy. For the purpose of this Policy, “**Protected Disclosure**” means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosures should be factual and not speculative in nature.

The policy covers malpractices and events which have taken place/ suspected to take place in the Company involving but not limited to abuse of authority, harassment or discrimination and workplace violence, confidential information of the Company, intellectual property of the Company, conflict of interest, theft / misuse / misappropriation of Company assets, improper promotion, irregular work practises, negligence causing substantial and specific danger to public health and safety, manipulation of company data/records, financial irregularities, including fraud or suspected fraud or deficiencies in internal control, deliberate violation of law/regulation, wastage / misappropriation of company funds/assets, bribery or corruption, retaliatory action with respect to Protected Disclosure or any other malpractice which is serious in nature and detrimental to the interest of the other employees and/or the Company. Any employee of the company making a Disclosure will be regarded as a “**Whistle-blower**”.

Individual work-related grievances are not covered under this Policy and the same shall be addressed as per the Grievance Redressal Mechanism of the company. The Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues. Any malicious Disclosure under this Policy shall be dealt with in the manner specified in paragraph 6 of this Policy.



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A Whistle-blower shall be a reporting party with reliable information of a genuine concern. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial actions that may be warranted in a given case.

The Company will ensure that the Whistle-blower and/or the person processing the Protected Disclosure is not victimized for doing so. The Company will ensure complete confidentiality of Protected Disclosures and the identity of the Whistle-blowers.

3. **Anonymity**

Whistle-blowers are encouraged to identify themselves when making Disclosures. However, Whistle-blowers may raise concerns anonymously as well.

The Company will decide to take up an anonymously expressed concern based on the following factors:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

4. **Committee**

All Disclosures must be addressed to a body constituted by the Company for the specific purpose of receiving and investigating Disclosures ("**Committee**"). The Committee will consist of the following members.

1. ("**Chairperson**") Chief Operating Officer – Mr.Suresh M R
2. Sr.Consultant -Finance Manager – Mr.Ganesh K U
3. Head – Marketing Division – Sr.Consultant – National Manager – Mr.Dwaraknath B M

If the complaint pertains to any of the members of the Committee, such member shall refrain from investigating the complaint. The person against whom the complaint has been made shall be given opportunity of hearing by following the principles of natural justice, before taking any action against him/her.

5. **Investigation**

The Committee shall conduct an enquiry in a fair, unbiased manner, in respect of the Disclosure(s) made by the Whistle-blower. The Committee will ensure complete fact-finding proceedings and maintain strict confidentiality, especially of the Whistle-blower's identity (if available).



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All documents/information pertaining to a Disclosure and the subsequent investigation shall be kept confidential.

The Committee shall submit its report after investigation to the Management of the Company. For the purpose of this Policy, the “Management” shall mean the persons in whose control the affairs of the Company are vested, including the Managing Director.

The Management shall be entitled to take appropriate action against the person(s) found guilty of malpractices/misconduct, based on the report of the Committee. The decision of the Management shall be final and binding on the concerned parties.

The Company is entitled to amend, suspend or rescind this policy at any time. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this policy.

6. Malicious Disclosure

An employee who knowingly makes false allegations shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures.

7. No Retaliation

The Company assures that there will be no retaliatory action against any Whistle-blower who has made a Disclosure in good faith, using the appropriate channel of communication as provided for in this Policy.

8. Report to Audit Committee

A quarterly report will be submitted to the Management by the Chairperson on the number of Disclosures and malicious complaints received in the preceding quarter, results of investigations, if carried out and any sanctions imposed on errant employees.

For N.RANGA RAO & SONS PRIVATE LIMITED




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SURESH M R
CHIEF OPERATING OFFICER
(AUTHORIZED SIGNATORY)