

4.9. Whistleblower Protection (Vide Annex 9)

- a. TISL is committed to promote integrity and the ethical behavior in the workplace and so whistle support individuals staff members' efforts to expose any non-ethical behavior in the workplace.
- b. TISL encourages staff members to expose any such behavior and is committed to providing whistle blower protection for such staff members.
- c. TISL will not tolerate harassment, retaliation or any type of discrimination against a whistleblower.

Annex 9 : Whistleblower Protection Policy **Whistle Blower Protection Policy**

Scope of this policy extends to all forms of discriminations (including gender) and all forms of corruption.

This policy addresses TISL's commitment to integrity and ethical behaviour. It confirms that the organization will not tolerate harassment, retaliation or any type of discrimination against an employee ("whistleblower") who:

- makes a good faith complaint about suspected organization or employee violations of law or
- violations of the organization's policies including a conflict of interest, a breach of applicable law, regulations or rules or what appears to be unethical, fraudulent or other illegal behaviour on the part of a colleague;
- makes a good faith complaint regarding accounting, internal accounting controls or auditing matters that may lead to incorrect, or misrepresentations in, financial accounting;
- provides information (or causes information to be provided) or assists in an investigation regarding violations of law; or
- files, testifies or participates in a proceeding relating to alleged violations of law.

Safeguards

q Harassment or Victimization

q Harassment, discharge, demotion, suspension or victimization of or threats (collectively, "Employment Issues") made to the whistleblower will not be tolerated. Wrongdoers will be disciplined consistent with the severity of the misconduct.

q **Confidentiality of Reports by Employees**

- q All complaints received from employees will be treated confidentially to the extent reasonable and practicable under the circumstances.
- q No penalty will be given against the employee for raising the issues. However, malicious and vindictive complaints do not attract protection under this policy.

q **Disciplinary Action**

- q Whistleblowers making complaints not in good faith may face disciplinary action consistent with the severity of the matter.

Reporting Procedures

- q All complaints must be made under name of the complainant and anonymous complaints are not entertained under this policy. Complaints, may be delivered in a sealed envelope addressed to the Chairman of the Board of Directors labeled “Private and Confidential to be opened by addressee only” and will be dealt exclusively by the board.
- q A whistleblower is not expected to prove the truth of an allegation, but must demonstrate to the person contacted that there are sufficient grounds for concern.

How the Complaint will be handled

- q Consideration of complaints is done only by the Board of Directors. The Board is required to keep the confidentiality of the source.
- q However, the Board may at its discretion consult any member of the staff members or outsiders, to investigate and report back to the Board on any such allegation.
- q The Board may decide on specific protection that should be extended to the relevant complainant, when the Board is satisfied that the complaint is bona fide (“Good Faith”)
- q If any investigation reveals discrimination and/or corruption, then further investigations/ inquiries shall be conducted by the management in respect of the relevant employee who is implicated in the whistle blowing complaint. In such event, the complainant shall be given specific protection against victimization.

Whistleblowers will be informed, in general terms (to avoid revealing confidential information) about the investigation outcome.