



ECOS (I) MOBILITY & HOSPITALITY LTD

WHISTLE BLOWER POLICY

Policy Objective

To provide a framework to employees to report in good faith, in case they observe unethical and improper practices or any other alleged wrongful conduct in the Organization and to protect employees who raise such concerns about serious irregularities within the Organization.

Policy Scope

All employees of Ecos (India) Mobility & Hospitality Limited.

Policy Guidelines

Definition

Protected Disclosure: A concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

Subject: A person against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

Whistle Blower: Someone who makes a Protected Disclosure under this Policy.

Ombudsman: An Authorized Person for the purpose of receiving all complaints under this Policy and ensuring appropriate action. Complaints will be received in written/text/whatsapp, to which only the Ombudsman will have access.

Procedure for Disclosure

An employee who comes to know or observes himself / herself any unethical & improper practices or alleged wrongful conduct, shall make a disclosure to the ombudsman in writing through letter/text/WhatsApp as soon as possible.

All disclosures must be sent to the Ombudsman.

Enquiry into the Disclosure

The Ombudsman will forward the concern to the MD. The MD will designate an individual (preferably from CXO/Function Level) for investigating the claims.

An external agency may also be engaged for investigating claims of a very grave nature, based on the discretion of the MD.

If initial enquiries by the designated authority indicate that the concern has no basis, or it is not a matter which requires investigation to be pursued under this Policy, it may be dismissed at this stage and the decision is documented.

Providing Ground Transportation in 100+ Cities In India & 30+ Countries Worldwide

ECOS (INDIA) MOBILITY & HOSPITALITY LIMITED

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Where initial enquiries indicate that further investigation is necessary, the designated authority shall have the right to call for any information or document and interrogation of any employee of the group or other person(s) as they may deem appropriate for the purpose of conducting investigation under this policy.

A report shall be prepared after completion of Investigation and submitted to the MD.

After considering the report, the MD would determine the course of action and may order for remedies.

Disqualifications

Protection under this Policy shall not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable to be prosecuted under Company's Code of Conduct

Secrecy/Confidentiality

The Whistle Blower, the Subject, everyone involved in the process shall:

Maintain complete confidentiality/ secrecy of the matter

Not discuss the matter in any informal/social gatherings/ meetings

Discuss only to the extent or with the persons required for the purpose of completing the process and investigations

Not keep the papers unattended anywhere at any time Keep the electronic mails/files under password

Protection

The designated authority will ensure that no adverse personnel action shall be taken or recommended against an employee in retaliation to his or her disclosure in good faith of any unethical & improper practices or alleged wrongful conduct. This policy protects such employees from unfair termination and unfair prejudicial employment practices.

However, this policy does not protect an employee from an adverse action which occurs because of poor job performance or any other misconduct unrelated to a disclosure made pursuant to this policy, etc., independent of his disclosure of unethical & improper practices or alleged wrongful conduct Reporting.

An annual report with number of complaints received (if any) under the Policy and their outcome shall be placed before the Managing Director by the Ombudsman.

Ombudsman

HR Head is appointed as Ombudsman under Whistle Blower Policy of the Company.

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