

WHISTLE BLOWER POLICY

1. PURPOSE

This policy provides a safe, confidential, and transparent mechanism for all stakeholders to report concerns about unethical conduct, legal violations, or human rights abuses—including those committed by **security service providers**—without fear of retaliation.

2. SCOPE

The policy applies to both **internal stakeholders** and **external stakeholders**, including:

- **Internal:** Permanent and temporary employees, contract workers, in-house vendors, security personnel
- **External:** Third-party suppliers, security contractors, community members, landowners, local leaders, NGOs

3. HUMAN RIGHTS CONCERNS COVERED

This policy specifically includes the following potential **abuses by security providers or others**:

- Use of **excessive force** against employees or community members
- **Illegal surveillance**, including monitoring without consent
- **Discriminatory behaviour** on the basis of caste, religion, gender, etc.
- **Unlawful detention** or unauthorized questioning/arrest
- **Verbal/physical abuse** or intimidation
- **Harassment** in the workplace or surroundings
- **Retaliation** against individuals reporting concerns
- **Suppression** of community rights or indigenous voices

4. REPORTING CHANNELS

Whistle blowers can confidentially raise concerns through the following secure channels:

Channel	Details
Email	dilipkumar@swhi.in
Whistle blower Hotline	9791063878
Drop Box	Anonymous complaint box near Admin/Security Office
In Person	Directly to HR, Legal, or Ethics Committee

Anonymous reports are accepted. Detailed information improves investigation quality.

5. INVESTIGATION PROCESS

- **Initial Review:** Within 3 working days by Ethics/HR team
- **Full Investigation:** Within 15 working days depending on complexity
- **Security-related Allegations:** Escalated to Legal + External Security Oversight Committee
- **Action Taken:** Includes warnings, termination of contract, or legal proceedings if needed
- **Closure:** Notification to complainant (if not anonymous) with outcome summary

6. NON-RETALIATION POLICY

No individual who reports in **good faith** will face retaliation. Any attempt to retaliate, intimidate, or silence whistle blowers will be considered a **serious violation** and subject to disciplinary action.

7. CONFIDENTIALITY

- Identity of the whistle blower is **strictly protected**
- All investigations will be handled with **maximum discretion**
- Reports will not be disclosed to anyone other than authorized investigating officials

8. AWARENESS AND TRAINING

- All employees and security personnel will undergo **annual awareness training**
- Whistle blower policy will be displayed on **notice boards** and **company intranet**
- Community grievance outreach will be conducted in **local language**

9. COMMITTEE OVERSIGHT

Member Role	Responsibility
HR Head	Policy Implementation
Legal Officer	Lawful Processing & Investigation Support
Independent Member	External ethics/human rights advisor
Security Lead	For verification of misconduct

10. FALSE COMPLAINTS

Knowingly false or malicious complaints may result in **disciplinary action**. However, no action will be taken if a concern is raised in **good faith**, even if not substantiated.

11. REVIEW AND UPDATE

The policy will be reviewed **annually** or earlier in case of any regulatory or operational changes.