

## **ELNET VIGIL MECHANISM / WHISTLE BLOWER POLICY**

### **1. SCOPE OF THE POLICY**

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company rules, manipulations, negligence causing danger to public health and safety, misappropriations of money, and other matters or activity on account of which the interest of the Company is affected and formally reported by whistle blowers concerning its employees.

### **2. ELIGIBILITY**

All Employees / Directors of the Company are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company.

### **3. RECEIPT AND DISPOSAL OF PROTECTED DISCLOSURES**

3.1. All Protected Disclosures should be reported in writing by the complainant as soon as possible after the Whistle Blower becomes aware of the same so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English.

3.2. The Protected Disclosure should be submitted in a closed and secured envelope and should be super scribed as "Protected disclosure under the Whistle Blower policy". Alternatively, the same can also be sent through email with the subject "Protected disclosure under the Whistle Blower policy".

If the complaint is not super scribed and closed as mentioned above, it will not be possible for the Audit Committee to protect the complainant and the protected disclosure will be dealt with as if a normal disclosure.

3.3. In order to protect the identity of the complainant, the company will not issue any acknowledgement to the complainants and they are advised neither to write their name / address on the envelope nor enter into any further correspondence with the company.

3.4. Anonymous / Pseudonymous disclosure shall not be entertained by the company.

3.5. The Protected Disclosure should be forwarded under a covering letter signed by the complainant. The Chairman of the Audit Committee, shall detach the covering letter bearing the identity of the Whistle Blower and process only the Protected Disclosure.

3.6. All Protected Disclosures should be addressed to the Chairman of the Audit Committee.

The contact details of the Chairman of the Audit Committee are as under:

Name and Address : Thiru G. Chellakrishna,  
66, Bazulla Road, T.Nagar, Chennai 600 017  
e-mail:krishna@cngsn.com

3.7. On receipt of the protected disclosure the Chairman of the Audit Committee, shall make a record of the Protected Disclosure and also ascertain from the complainant whether he was the person who made the protected disclosure or not. He shall also carry out initial investigation either himself or by involving any other Officer of the Company or an outside agency before referring the matter to the Audit Committee of the Company for further appropriate investigation and needful action.

The record will include:

- a) Brief facts;
- b) Whether the same Protected Disclosure was raised previously by anyone, and if so, the outcome thereof;
- c) Whether the same Protected Disclosure was raised previously on the same subject;
- d) Details of actions taken by Vigilance and Chairman of the Audit Committee for processing the complaint
- e) Findings of the Audit Committee
- f) The recommendations of the Audit Committee/ other action(s).

3.8. The Audit Committee, if it deems fit, may call for further information or particulars from the complainant.

3.9 The investigation shall be completed normally within 3 months of the receipt of the protected disclosure and is extendable by such period as the Audit Committee deems fit.

#### **4. DECISION AND REPORTING**

4.1. If an investigation leads the Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the Chairman of the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as he may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

4.2.If the investigation is not to the satisfaction of the complainant, the complainant has the right to report the event to the appropriate legal or investigating agency.

4.3. A complainant who makes false allegations of unethical & improper practices or about alleged wrongful conduct to the Chairman of the Audit Committee, then the Audit Committee shall be subject to appropriate disciplinary action as the Committee may deem fit.

### **5.SECRECY / CONFIDENTIALITY**

5.1. The complainant, Members of Audit Committee, the Subject and everybody involved in the process shall:

- a) Maintain confidentiality of all matters under this Policy
- b) Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.
- c) Not keep the papers unattended anywhere at any time
- d) Keep the electronic mails / files under password.

### **6.ACCESS TO CHAIRMAN OF THE AUDIT COMMITTEE**

The Whistle Blower shall have right to access Chairman of the Audit Committee directly in exceptional cases and the Chairman of the Audit Committee is authorized to prescribe suitable directions in this regard.

### **7.COMMUNICATION**

A whistle Blower policy cannot be effective unless it is properly communicated to employees. The whistle Blower policy has been disclosed in the website of the company.

#### **8.RETENTION OF DOCUMENTS**

All Protected disclosures in writing or documented along with the results of Investigation relating thereto, shall be retained by the Company for a period of 8 (eight) years or such other period as specified by any other law in force, whichever is more.

#### **9. ADMINISTRATION AND REVIEW OF THE POLICY**

The Chairman of the Audit Committee shall be responsible for the administration, interpretation, application and review of this policy. The Chairman of the Audit Committee is empowered to bring about necessary changes to this Policy, if required at any stage with the concurrence of the other members of the Audit Committee.

#### **10.AMENDMENT**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and Directors unless the same is communicated to them as per Clause 9 above.

Date: 30.01.2015

Place: Chennai