

INDORAMA

Bringing premium elastomers to your doorstep



Indorama Industries Limited

Whistleblower Policy

This Whistleblower Policy of Indorama Industries Limited (the Company / IIL) is in compliance of Section 177 of the Companies Act, 2013. The Policy has been approved by the Board of Directors of the Company.

Whistleblower Policy

1. Purpose

- 1.1. The purpose of Indorama Industries Limited (“IIL”) Whistleblower Policy is to enable employees who observe an unethical practice (whether or not a violation of law), to approach the Whistleblower Committee/ Vigil Mechanism without necessarily informing their line managers and without revealing their identity.
- 1.2. This policy governs reporting and investigation of allegations of improper activities. In all instances, the Whistleblower Committee/ Vigil Mechanism retains the prerogative to determine when the circumstances warrant an investigation and, in conformity with the policy and applicable laws and regulation, the appropriate investigative process to be employed.

2. Definitions

- 2.1. **Company:** Indorama Industries Limited.
- 2.2. **Employee:** Every employee of IIL including directors.
- 2.3. **Whistleblower:** An Employee making a Protected Disclosure of any unethical activity that he/she has observed.
- 2.4. **Investigators:** Any persons authorized, appointed or consulted by the Whistleblower Committee/ Vigil Mechanism, including the Internal Audit Committee.
- 2.5. **Whistleblower Committee:** A committee that examines any disclosure made by the Whistleblower, to be composed of Commercial Head, Marketing Head, Plant Head and Business Head of IIL.
- 2.6. **Protected Disclosure:** Any communication made in good faith, with the honest belief that there are reasonable grounds for concern that discloses or demonstrates information that may be evidence of unethical or improper activity. The Company and management shall not disclose the identity of the Whistleblower and initiate any unfair or punitive action, which includes, among others, changing his/her position, job description or work place; suspending, threatening, harassing or laying-off the whistleblower.
- 2.7. **Subject:** A person against or in relation to whom a Protected Disclosure has been made.

3. Protected disclosure

- 3.1. Employees may make disclosures concerning
 - a. Any act that violates the Company’s Ethics Policy and any act that adversely affect the business interest of the Company

- b. Any act that is illegal under local or international law.

4. Reporting Procedure

A disclosure may be reported anonymously to the Whistleblower Committee through any of the channels mentioned below;

4.1. Email: info@indorama.in

4.2. Letter: A written disclosure may be sent to
Business Head
Indorama Industries Limited
Plot No. 10, Lodhimajra Industrial Area, Baddi,
Dist- Solan Himachal Pradesh (or)

Chairman - Audit committee
Indorama Industries Limited
Tower-B, 2nd Floor, DLF IT Park,
Chandigarh

- 4.3. A Protected Disclosure may also be made to an immediate line manager (in cases where there is no potential conflict of interest). In such cases the line manager shall address the report to the Whistleblower Committee by taking appropriate care to conceal the identity of the Whistleblower.
- 4.4. Protected Disclosures should preferably be reported via email or in writing in English. If written in a Hindi, it can be translated into English for further investigation.

5. Procedure for investigation of Protected Disclosure

- 5.1. The Whistleblower Committee will determine whether the Protected Disclosure actually pertains to a compliance or ethical violation within 7 business days of receipt.
- 5.2. If the Whistleblower Committee determines that the protected disclosure is valid, an investigation by the Internal Audit Department Head/authorized person by the Committee, will investigate the alleged violation.
- 5.3. The Internal Audit Head/Authorized person by the Committee will file a report of the investigation's findings to the Whistleblower Committee along with evidence, if any, within a month of receipt of the Protected Disclosure. An extension may only be granted after consideration by the Whistleblower Committee.

6. Process Following a Protected Disclosure Investigation

- 6.1. The Subject has a right to be informed of the outcome of the investigation

6.2. If the investigation leads to conclude that an improper or unethical act has been committed by the Subject, the Whistleblower Committee shall recommend the appropriate corrective action or disciplinary proceedings deemed necessary.

In the event that any provision contained in this Policy is in conflict with that of local laws, rules and regulations, such local laws, rules and regulations shall prevail.