

CINELINE INDIA LIMITED- WHISTLE BLOWER POLICY

This policy is setup to provide an internal mechanism to the company to be notified of the concerns about malpractices at the workplace.

This policy applies to all the people of the company. Employee includes regular employees, payroll employees, consultants, retainers and temporary employees and all other direct or indirect employees of Cinline India Limited (CIL).

As a conscious and vigilant organization, CIL Believes in conducting business in fair and transparent manner by adopting the highest standards of responsibility, honesty, integrity and ethical behavior. It expects all employees to maintain the same level and standard in everything and each thing they do. With an intention to provide an employee with secure and fearless environment, CIL has established the Whistle blowers policy.

All employees are encouraged to use the procedure set out if they have concerns at all about any wrong doing at work.

Whistle Blowing means disclosure of information relating to any of the following (happening now, took place in the past or is likely to happen in the future)

1. Abuse of authority
2. Manipulation of company data/ records
3. Financial irregularities including fraud or suspected fraud
4. Pilferage of confidential company information
5. Wastage/ misappropriation of company funds/ assets
6. Deliberate violation of law/ regulation
7. Negligence causing danger to individual/ public health and safety
8. Breach of contract
9. Criminal offense
10. Damage to environment
11. Influencing company vendors for personal work using company name.
12. Purchasing goods on the name of the company and not paying.

At no point employees should use this platform as a route for taking personal grievances against someone.

Whistle blowers, who make the disclosures, which when subsequently are found to be made malafide, frivolous, malicious or baseless shall be liable for appropriate disciplinary action.

Whistle blowers can raise their concern in writing directly to Mr. Himanshu Kanakia, being the Managing Director of the Company.

Whistle blowers must put his/her name on the disclosure. Concerns expressed anonymously will not be usually investigated but subject to seriousness of the issue raised, the designated authority can initiate the investigation.

The investigation will be carried in a fair manner, as a neutral fact finding process and without presumption of guilt.

If there is a case to answer and if appropriate, disciplinary action will be taken against the person's who the subject to allegations.

Whether there was a case to answer or not, and provided that your disclosure was made in good faith because you reasonably believed it to be true, the company will ensure that you are protected from reprisal or victimization as a result of your complaint.

Only where it is established that your allegations were false and made maliciously will disciplinary action be taken against you. Such disclosures will be treated as gross misconduct and the employee is liable for appropriate disciplinary action.