

General

Unique Punch Systems Pvt Ltd(UPS) requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of UPS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all directors, officers, employees, and volunteers to comply with and to report violations or suspected violations of UPS policies or laws in accordance with this policy.

III. No Retaliation

No director, officer, employee, volunteer, or contractor UPS in good faith reports a violation of UPS policies, or law shall suffer harassment, retaliation or adverse employment consequence.

An employee UPS retaliates against someone UPS has reported a violation in good faith is subject to discipline up to and including termination of employment.

This Whistle-blower Policy is intended to encourage and enable employees and others to raise serious concerns within UPS prior to seeking resolution outside UPS.

EXAMPLES OF RETALIATION

Harassment

Discrimination

Unsubstantiated, negative performance appraisals

Unjustified contractual changes: termination, demotion, reassignment or transfer

Unjustified modification of duties

Unjustified non-authorization of holidays and other leave types

Malicious delays in authorizing travel or the provision of entitlements

Threat to the whistleblower, their family and/or property including threats that may come from outside UPS.

IV. Reporting Violations

Directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone UPS can address them properly.

In most cases, employees and volunteers should report to the UPS HR.

V. Acting in Good Faith

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation UPS policy, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

VI. Confidentiality

Upon the request of the complainant, UPS will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

VII. Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the HR. The Executive Committee shall be informed of all such complaints or reports.

Prepared By	Approved By