



InterMarket

ISO 9001:2008 & ISO 14001:2004 certified company

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The Whistle Blower Policy



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Name of the Company	INTERMARKET INDIA PVT LTD (“the Company”)
Program Title	The Whistle Blower Policy
Policy type	Compliance
Category	Country specific policy - Applicable to Indian operations of (“the Company”)
Coverage	All employees and Directors and Third parties who may wish to report a concern related to a potential violation of the Company Code of Conduct

Purpose of this policy:

The purpose of this policy is to articulate the Company’s point of view on **whistle blowing**, the process, and the procedure to strengthen whistle blowing mechanism at the Company.

This policy:

- Provides a platform and mechanism for the employees and directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- It provides an environment that promotes responsible and protected whistle blowing. It enables Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Group Values or the Company’s Code of Conduct or insider trading norms.
- Above all, it is a dynamic source of information about what may be going wrong at various levels within the Company and which will help the Company in realigning the processes and take corrective actions as part of good governance practice.

Coverage of this policy:

- This policy is applicable to all the Units/Zones in India, including all employees and Directors.
- This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.

Who is a whistle blower?

Any Employee or Director who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the Company’s Code of Conduct or Group Values. This whistleblower has come to the decision to make a disclosure or express a genuine concern /grievance/allegations, after a lot of thought.

Protection:

The process is designed to offer protection to the whistleblower (employees and directors) provided that the disclosure made / concern raised / allegations made (“complaint”) by a whistleblower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Group Values and/or Company’s Code of Conduct.

The Company affirms that it will not allow any whistleblower to be victimized for making any complaint. Any kind of victimization of the whistleblower brought to the notice of the Value Standards Committee will be treated as an act warranting disciplinary action.

As a Company, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against the whistleblowers. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

[Reporting in good faith](#)

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumour. This also means that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with ulterior intent/motive, the Value Standards Committee should take appropriate disciplinary or legal action against the concerned whistleblower.

[List of exclusions](#)

The following types of complaints will ordinarily not be considered and taken up:

1. Complaints that are illegible, if handwritten
2. Complaints that are trivial or frivolous in nature
3. Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
4. Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed
5. Issue raised, relates to service matters or personal grievance (such as increment, promotion, appraisal etc) also any customer/product related grievance.

[Dealing with anonymity](#)

A whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

[Confidentiality](#)

The Value Standards Committee will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.

[Who is a whistle blower officer?](#)

For the purpose of this policy, the whistle blower officer will be Vice –President of the Company at a Business level (or in his/her absence, the Legal Head) and Promoter Directors (or in his/her absence, the Legal Officer) of the relevant Unit would act as the Whistle Blower Officer of the relevant Values Standard Committee.

[Procedure for raising a complaint](#)

A whistleblower can make a complaint in multiple ways:

1. Can write to the relevant Value Standards Committee. The information about Value Standards

Committee (VSC) at various levels, their e-mail id are available with respective unit/zonal HR Team or Business Head Team.

2. A whistle blower can send a complaint to the ethics hotline by calling on a toll free number **1800 889 2831**, or write to shri@intermarket.co.in . This is operated by an independent third party vendor.
3. By writing to the CHRO or Unit Head or Business Head or Company Secretary of the relevant Group Company, as these officials are duty bound to share the complaint with the Ethics Hotline.
4. In exceptional cases, the complainant can directly report his/her complaint to the Promoter Directors email ID : raj@intermarket.co.in Details of the Promoter Directors is available on the Company's website.

[Guidelines for communication and implementation of this policy](#)

This toll free number will be available for reporting of any violation or misconduct. A communication mechanism should be put in place to create awareness about this with the existing employees and for new joinees in all Group Companies operating in India.

It is the responsibility of the V.P of the Company to ensure that the updated names and email id of the various Business and Unit level Value Standards Committee is made available to all employees through the local intranet and/or any other communication mechanism they may adopt. A copy of this policy shall also be placed on the intranet of the Company.

This policy is equally applicable to Third parties who may wish to report a concern related to a violation / potential violation of the Group Values or the Company Code of Conduct or Insider Trading norms.

[Important Templates](#)

Annexure 1 – Template for reporting violations

Annexure 1 - Template for Reporting Violation

To: Value Standards Committee <at Group/ Business or Unit level>: _____

Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Please note that multiple issues can be selected

1. Misappropriation of company assets or resources
 2. Conflict of interest
 3. Inappropriate sharing of confidential information
 4. Financial fraud of any nature
 5. Violation of gifts and entertainment policy
 6. Non-adherence to safety guidelines
 7. Inaccurate financial reporting
 8. Bribery & Corruption
 9. Insider trading including instances of leak or suspected leak of Unpublished Price Sensitive Information (UPSI)
- 5

- 10. Other forms of Harassment – Victimization, Bullying, Discrimination etc.
- 11. Social Media Usage
- 12. Misuse of authority
- 13. Environment, health and safety
- 14. Concurrent employment
- 15. Others _____

Please provide name, designation and department of the person(s) involved?

	Name	Department	Designation
Individual 1			
Individual 2			
Individual 3			
Individual 4			

When did the incident occur? (Please provide tentative date if you do not know the exact date)

Please confirm the location of the incident

How did you find out about this incident?

How long has this been occurring for?

- **Less than a month**
- **1-6 months**
- **6-12 months**
- **Greater than 12 months**

Please provide a detailed description of the incident. To enable your company to act on your complaint, you are requested to provide specific information. Where possible, please include names, location, date, time etc. Please note that this field is limited to 5,000 characters.

Do you have any evidence in support of your allegations?

- **Yes**
- **No**

Is anyone else aware of this incident?

- **Yes**
- **No**

Is there any additional information that would facilitate the investigation of this matter?

- **Yes**
- **No**

Have you reported this incident to anyone in the company?

- **Yes**
- **No**

Date: _____

Location: _____

Name of the Person reporting (optional): _____

Contact Information (incl email optional): _____

