

WHISTLE-BLOWER POLICY

1. Objective

Jain Metal Group is dedicated to maintaining a high standard of ethical conduct, transparency, and accountability in all aspects of its operations. This policy provides a structured mechanism for reporting and addressing suspected misconduct or unethical practices while safeguarding the rights of those reporting in good faith.

2. Scope

This policy applies to all employees, contractors, suppliers, and other stakeholders associated with Jain Metal Group. Covered concerns include any activity that may violate legal standards, internal policies, environmental practices, or ethical guidelines. Examples include financial misconduct, operational non-compliance, health and safety breaches, and actions that may harm the Group's reputation, stakeholders, or the environment.

3. Reporting Mechanisms

Jain Metal Group encourages the prompt reporting of any suspected wrongdoing. Reports can be made through a secure hotline or a designated email address, managed by an independent party to ensure objectivity and confidentiality. Employees and external stakeholders are encouraged to share detailed information to enable a thorough review.

4. Confidentiality and Anonymity

The Group respects the confidentiality of all whistle-blowers. Reports can be submitted anonymously if preferred, and whistle-blower identities will only be disclosed if necessary for the investigation or required by law. Information is managed with strict confidentiality to protect the whistle-blower's privacy.

5. Anti-Retaliation Commitment

Retaliation against whistle-blowers is strictly prohibited. Any adverse action against individuals who report concerns or participate in investigations will result in disciplinary measures, as Jain Metal Group is committed to fostering a safe reporting environment.

6. Investigation Process

Upon receiving a report, Jain Metal Group will initiate a formal investigation, led by the Whistle-blower Investigation Committee. This committee, composed of designated senior executives and compliance officers, ensures that investigations are conducted fairly and comprehensively.



6.1. Whistle-blower Investigation Committee Composition

The Whistle-blower Investigation Committee will include:

- ✓ **Head of Compliance and Ethics:** Responsible for policy adherence and impartial oversight.
- ✓ **Senior HR Representative:** To provide insight into personnel issues and ensure fair treatment of all parties involved.
- ✓ **Legal Counsel Representative:** Ensures legal compliance and provides advice on regulatory and legal matters.
- ✓ **Operations Head or a Department Representative:** Selected based on the nature of the report to provide relevant technical or operational expertise.
- ✓ **External Auditor (if necessary):** An independent external expert may be appointed for cases involving complex technical matters or high sensitivity.



Whistle-blower Investigation Committee

The committee will conduct investigations objectively, gathering facts and evidence to assess the validity of the report. Each case will be reviewed based on its specifics, and, if necessary, the committee may seek additional information from the whistle-blower.

6.2. Investigation Procedure

- **Initial Assessment:** The committee performs a preliminary assessment of the report to determine its legitimacy and the appropriate level of investigation. This may involve reviewing relevant documents or initial interviews.
- **Evidence Collection:** The committee gathers information, which may include interviews with witnesses, a review of relevant documents, and an analysis of



operational records. In some cases, external experts may be consulted for specialized insight.

- **Findings Documentation:** The committee records its findings, noting any breaches of policy, operational standards, or ethical guidelines, along with supporting evidence.
- **Action Recommendation:** Based on the findings, the committee prepares a report recommending necessary actions. These may include disciplinary action, policy adjustments, additional training, or improvements in internal controls.
- **Committee Review and Approval:** The findings and recommendations are presented to senior management for approval before implementation.

7. Corrective Actions and Follow-Up

Should the investigation confirm a policy violation or legal breach; Jain Metal Group will take corrective actions promptly. These may range from disciplinary measures to process improvements. The whistle-blower may be informed of the investigation's outcome, within the bounds of confidentiality and legal obligations.

8. Policy Review and Updates

The Whistle-blower Policy is subject to periodic (suggestion is to set the review in every 3 years or any major changes in concerned operations whichever is earlier) review to ensure it reflects current laws, industry best practices, and Jain Metal Group's commitment to ethical conduct and regulatory compliance.

Approved by: Board of Directors **Effective Date:** 31.01.2025

For JAIN RESOURCE RECYCLING LIMITED

Bishu Kalyan Rauta

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Company Secretary

