

# POLYCAB

POLYCAB INDIA LIMITED

## INVESTIGATION POLICY

<i>Particulars</i>	<i>Date</i>	<i>Version</i>
<i>Policy adopted</i>	<i>May 10, 2022</i>	<i>1.0</i>

## Investigation Policy

This Investigation policy provides guidance for conducting investigations by Whistle Blower Committee of all major misconduct including unethical behavior, alleged violations or potential violations of laws, regulations, or Polycab's Code of Conduct, policies, procedures or operating procedures, standards.

### **1. Purpose:**

The purpose of the investigation is to seek information and conduct review the allegations, examine all relevant evidence, and conclude whether misconduct was committed. Investigations have become a vital part of corporate governance. This policy ensures that employees who are subject to Investigations are treated fairly and consistently. By creating an accessible investigation policy, organizations can quickly entrust employees to carry out investigations efficiently. The Company treats allegations of violation seriously and will take all steps necessary to investigate and address allegations of misconduct.

### **2. Scope / Applicability:**

This policy is applicable to all the activities within the organization. This Policy applies to all of the Company's directors, officers, and employees, Company's agents, consultants, joint venture partners, and any other third party representatives who have performed work on behalf of the Company.

### **3. Definitions:**

- **"Company"** means, "Polycab India Limited."
- **"Investigator"** means the Whistle Blower Committee or Whistle Officer or such other committee as may be designated by the Audit Committee to investigate any complaint / allegation / findings / observation / legal proceedings.
- **Minor Misconduct** This applies where it is alleged that there is some fault or blame on the part of the employee concerned. Misconduct can include, but will not be limited to,
  - i. Indulging in verbal abuse,
  - ii. Failure to effectively monitor the actions of people you manage.
  - iii. Persistent poor timekeeping,
  - iv. Insubordination
  - v. Habitual absence without leaves
  - vi. Disruptive behaviour
  - vii. Failure to participate in required training or compliance process
- **"Policy or This Policy"** means this Investigation Policy
- **"Major Misconduct"** Serious misconduct includes, but is not limited to, below incidents or actions:
  - i. Violate the Company Code of Conduct, Company policies and procedures, or applicable laws or direct others to do the same

- ii. Purposefully not reporting any known violation
- iii. Do not cooperate in a Company investigation or audit.
- iv. Retaliate against someone for reporting a concern or participating in an investigation.
- v. Leak information learned during an ongoing investigation
- vi. Wilful insubordination of your manager or senior over a reasonable task related to work
- vii. Going on an illegal strike, or abetting, inciting, or instigating or acting in furtherance thereof
- viii. Wilful slowing down in work performance or wilful negligence at work
- ix. Indecent behaviour, theft, and damage to company's assets
- x. Compliance and Integrity violations
- xi. Sexual harassment including unwelcome sexual determined behaviour (direct or implied) – physical contact and advances, demand or request for sexual favour, sexually coloured remarks, showing pornography, and any other unwelcome physical, verbal, or nonverbal conduct of sexual nature.

#### 4. Categorization of Complaints:

The complaints received by the Company through various modes are categorized as under :

- a. **Minor Misconduct** – The complaints which are Minor incidents shall be referred to Human Resources for conducting an enquiry as per the company policy.
- b. **Consumer related complaints** – The complaints which are relating products / services offered by the Company shall be referred to respective BU Head and investigated as per the relevant policy.
- c. **Sexual Harassment complaints** – The complaints relating to sexual harassment as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 shall be referred to Internal Committee established under the Act. The same shall be investigated as per the Policy for prevention of Sexual Harassment.
- d. **Serious Misconduct** – All complaints which are categorized as serious Misconduct (except sexual Harassment as referred in c above) shall be referred to the Whistle Blower Committee and investigated as per this policy.

#### 5. Investigator's Role and responsibilities:

The role of the Investigator during an investigation is to:

- i. Determine the initial scope and focus of the investigation.
- ii. Determine the facts of the allegations or events giving rise to the investigation.
- iii. Ensure not only that an appropriate investigation occurs, but to track and monitor investigations.
- iv. Coordinate the investigation, including necessary adjustments to the scope, focus, and duration.
- v. Conduct the investigation in a fair, unbiased manner

- vi. Identify and seek direction regarding any potential conflicts of interest that may be presented during the investigation.
- vii. Ensure that the Audit Committee of the Board of Directors is provided with regular updates and information about investigations.

The investigator is ultimately responsible to ensure compliance with the applicable laws, regulations, policies and procedures of the Company. The investigator shall ensure that an appropriate investigation of all concerns has occurred and that adequate resources and facilities are available to carry out the proposed investigation. The investigator is responsible for identifying lines of enquiry, recording information, producing a report, giving evidence, and retaining records. The investigator shall make sure to comply with labor law, confidentiality and data protection requirements.

#### **6. Conducting Investigation:**

When Company receives a complaint either under Whistle Blower Policy or through other means it should take immediate steps to stop the conflict, protect parties involved and begin the investigation. All complaints received by HR / IC / BU Head shall be provided to Whistle Officer on [speakup@polycab.com](mailto:speakup@polycab.com) for scrutiny and provide regular updates on the concerned matters.

The proceedings of the investigation are confidential in nature, and all reasonable steps will be taken to protect interests of the Company, to respect the rights of its employees, and to respect the confidentiality of information involved. The Company reserves the right to make any disclosures of the information learned in Investigations as appropriate or necessary to protect interests of the Company, seek advice, counsel or assistance from third parties in connection with the Investigation, and/or to comply with applicable laws or regulations.

All employees, including all levels of management, must cooperate fully with and provide appropriate assistance to ongoing Investigations, and must maintain the confidentiality of Investigations.

The investigation may involve study of documents and interviews with various individuals. Any person who is required to provide documents, access the systems and other information by the Investigator for the purpose of such investigation shall do so. Individuals with whom the Investigator requests an interview for the purposes of such investigation shall make themselves available for such interview at reasonable times and shall provide the necessary cooperation for such purpose. It is the Company's expectation that parties involved in interviews be truthful and provide complete answers to interview questions.

If the malpractice/violation constitutes a criminal offence, the investigator shall take appropriate action including reporting the matter to the police.

Documented evidence is highly reliable in any investigation. After documenting the evidence the investigator should evaluate them properly to ensure it is sufficient, relevant, comprehensive, and reliable. Recording of the interview is permitted provided prior consent of the participants is obtained.

**7. Retaliation:**

The Company prohibits retaliation against anyone who makes reports in good faith. The Company also prohibits retaliation against anyone who participates in the investigation of such a report. All witnesses will be treated with respect. Any employee found to be engaging in retaliation will be subject to disciplinary action up to and including termination.

**8. Making Recommendations:**

The Investigator shall determine facts and gather sufficient evidence to determine if corrective action is warranted. The Investigator shall disclose and discuss all such findings to determine appropriate follow-up action, including potential corrective action and/or disciplinary action.

At the conclusion of every Investigation, investigator will determine if disciplinary action is warranted, and if so, the appropriate disciplinary action. Employee misconduct, as well as deficiencies in controls, policies, and standards identified by the investigation must be analyzed and corrective action must be taken to address them.

**9. Decision and Reporting:**

On completion of investigation, results shall be summarized for the Audit Committee, including any remedial measures to be taken. The investigator will develop an Investigation Report detailing the investigation, its findings, and recommendations. The findings of the report shall be shared with Audit Committee.

Investigations will be conducted as expeditiously as possible, without jeopardizing the integrity of the Investigation.

**10. Retention and storage of evidence and records:**

All relevant documents and evidence should be retained by the Investigator in line with Company's policy and procedures.

**11. Amendment**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

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