



Whistle Blower Policy

4/8/2019

Public

Version 1.0

Document Information

Document title	Whistle Blower Policy
Current Version	Version 1.0
Effective Date	4/8/2019
Status	Draft
Document Owner	Ravi Kiran
Document classification	Public

REVISION HISTORY

Date of Revision	Version No.	Description of Change	Created / Updated by	Reviewed by	Approved by
08/04/2019	1.0	Initial Release	Ravi Kiran	Vishwajeet	Riyazahmad Mulla

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1 Purpose

The purpose of this Policy has been established to ensure that all cases of suspected wrongdoing are reported and managed in a timely and appropriate manner.

2 Scope

This policy is applicable to all entities or interested parties of CubeLogic.

3 Policy Statement

The Statements of this policy are as follows:

- Ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything, improper, unethical or inappropriate;
- Encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the organization;
- Provide clear procedures for the reporting of such matters;
- Manage all disclosures in a timely, consistent and professional manner; and
- Provide assurance that all disclosures will be taken seriously, treated as confidential and managed without fear of retaliation.

4 Approval and adoption

This policy, which has been approved by the Management of CubeLogic, is a statement that **improper, unethical or inappropriate behavior within the organization is unacceptable** and this statement is endorsed and supported at the highest level.

5 Reporting of Event

This policy is designed to deal with concerns raised in relation to specific issues which are in the public interest and detailed below. Only genuine concerns should be reported. Whistle blowing means a disclosure of information made by an employee or contractor, an external

person or body where they reasonably believe that one or more of the following matters is happening now, took place in the past or is likely to happen in the future. This is a non – exhaustive list of examples:

- Criminal offence;
- Fraud;
- a failure to comply with a legal obligation (e.g. breach of a contractual or other common law obligation, statutory duty or requirement or administrative requirement, including suspected fraud, malpractice or breach of the CubeLogic Code of Conducts);
- A miscarriage of justice;
- Danger to the health and safety of any individual;
- Damage to the environment; and
- Deliberate concealment of information tending to show any of the above.

CubeLogic has other policies and procedures that deal with complaints, critical or constructive comments, and appeals.

Disciplinary, Grievance, Harassment and Equal Opportunities policies also address standards of behavior at work. The relevant policy should be followed where appropriate.

This policy can be used by any officer, employee or group of employees or contractor. In addition suppliers, shareholders, customers and other third parties such as agents, distributors or joint venture partners may also use this policy to report suspected wrongdoing.

6 Reporting Process

You can raise your concerns by email, orally or in writing, stating that you are using the Whistle Blowing Policy. We request that, where possible, you include the information below:

- An outline of the known or suspected wrongdoing;
- Details, to the best of your knowledge, about when, where and how it occurred;
- A list of the names of those suspected of being involved (both within CubeLogic and externally);
- A list of the names of anyone who may have relevant information;
- Details of how you came to know about the suspected activities;
- What, if any, do you estimate to be the value of the loss to CubeLogic or other parties;
- What, if any, breaches of internal controls, policy, procedure or other requirements you believe took place;
- Any specific recommendations you have for actions;
- The names of anyone who you have discussed or reported this incident to;
- Your name and contact details. Please note – these will be kept confidential as far as is reasonably practicable; and
- Date and time of reporting the event. You will not be expected to prove the wrongdoing that you believe you have witnessed or suspect.

7 Anonymity

We understand that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. When this is

the case we will endeavor to investigate your concerns fully, although a full investigation may be impeded if we cannot obtain further information from you.

8 Protection

CubeLogic undertakes that no one who reports any concern under this policy in good faith will be subjected to any detriment for coming forward, regardless of whether or not the concern is ultimately substantiated. In the event that a reporter believes that they are being victimized or subjected to a detriment by any person within the company as a result of reporting a concern or assisting the company in any investigation under this policy they must inform the HR immediately and appropriate action will be taken to protect them from any reprisal.

9 Disciplinary action

If during the course of the investigation it is discovered that the matter has not been reported in good faith, this will be subject to investigation under the local disciplinary procedure.

10 Data protection and privacy

All information shall be treated confidentially as far as reasonably practicable. There may be circumstances where, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. In such circumstances every effort will be made to inform you before such disclosure is made. If it is necessary for you to be involved in an investigation (for example by providing evidence), the fact that you made the original disclosure will, so far as reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure.

11 Further information

If you have any questions about the content or application of this policy, you should contact the HR Head or you can mail us at Info@cubelogic.com