

OPEN DOOR POLICY

OBJECTIVE:

- To provide all employees, customers and vendors an avenue to raise concerns, in line with the commitment of Harrissons Malayalam Limited (HML) to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.
- To provide necessary safeguards for protection of employees from reprisals or victimization, for bringing out the truth in good faith.

SCOPE: All permanent employees, customers and vendors of HML.

THE ROLE OF THE COMPLAINANT (*an employee/customer/vendor*):

- The complainant's role is to report a serious concern (actual or suspected). The complainant shall **not** report any petty complaints. These concerns could have a large impact on HML, such as actions that:
 - ★ *may lead to incorrect financial reporting;*
 - ★ *are not in line with applicable company policy;*
 - ★ *are unlawful or,*
 - ★ *otherwise amount to serious improper conduct.*
- Bring to early attention of the company any improper practice, as above, they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern.
- Co-operate with investigating authorities, maintaining full confidentiality.
- Accept the decision of the Adjudicating committee.
- In exceptional cases, where the complainant is not satisfied with the outcome of the investigation carried out by the Adjudicating committee, s/he can make a direct appeal to the Managing Director.
- Provide full co-operation to the Investigation team.

SAFEGUARDS:

- Any harassment or victimisation of the complainant will not be tolerated by the Management.
- If any employee who victimises or harasses a complainant, such actions could constitute sufficient grounds even for dismissal of such an employee.
- Every effort will be made to protect the complainant(s) identity and would be kept confidential to the extent possible, subject to legal constraints.

HOW TO RAISE A CONCERN?

- Complainant must put their names to the complaint as follow-up questions and investigation may not be possible unless the source of the information is identified. Complainants should not make any malicious allegations on any person, which may result in adequate disciplinary action.
- By making a complaint, the complainant is submitting to the jurisdiction of the Adjudicating Committee, and the procedures and practices covered by this Policy, including the disciplinary actions provided for making malicious allegations to settle personal vendata.
- Concerns expressed anonymously **will not be** usually investigated **but** subject to the seriousness of the issue raised, the Adjudicating Committee can initiate an investigation even based on such concerns.
- The complainant must send their report (hard copy or email) to the Authorised Person / any of the members of the committee.
- The Adjudicating Committee has been authorised by the Company's Management to receive all complaints under this policy and ensure appropriate action.
- Any complaint against any member of the Adjudicating Committee should be escalated either to MD or Sector Head.

AUTHORISED PERSON: Mr. Mathew KN

Contact Details: Vice President- Finance, Harrissons Malayalam Limited, 24/1624, Bristow Road, Cochin -682 003. Phone: Direct Tel No: 2666 358. Mobile No: 944 777 555 2. E-mail ID: mathewkn@harrisonsmalayalam.com

The Other committee members are:

1. **Mr. Baburaj Nair, General Manager – HR. E-mail ID : baburaj@harrisonsmalayalam.com**
2. **Mr. V Venugopal, Chief Manager – Legal. E-mail ID: venugopal@harrisionsmlayalam.com**

RESPONSIBILITY OF THE AUTHORISED PERSON & COMMITTEE:

- Ensure that the policy is being implemented. Ensure that necessary safeguards are provided to the complainant and maintain strict confidentiality.
- All complaints received will be recorded and looked into. The complainant will receive acknowledgement on receipt of the report on the concern, thanking him/her for the initiative taken in upholding the company's business conduct standards.
- If initial enquiries indicate that the concern has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision documented. Subject to legal constraints, the complainant will receive information about the outcome of any investigations.
- The investigation, if found required, would be conducted in a fair manner, as a neutral fact finding process and without presumption of guilt.
- Based on a thorough examination of the findings, where an improper practice is proved, this would cover suggested disciplinary action, including dismissal, if applicable, as well as preventive measures for the future. All discussions would be minuted and the final report prepared.
- The Authorised person/ Adjudicating Committee would recommend an appropriate course of actions to the MD of HML. A quarterly report shall be prepared and send to the Sector Head and a copy to the Group President HR.
- The Managing Director shall have a quarterly review of the procedures/actions of the Adjudicating Committee along with the Sector Head and Group President – HR
- Ensure necessary actions on the recommendations of the Authorised person / Committee.

CHANGES TO POLICY

This policy can be changed, modified, rescinded or abrogated at any time by HML.

1st March, 2010

Sd/-
MANAGING DIRECTOR