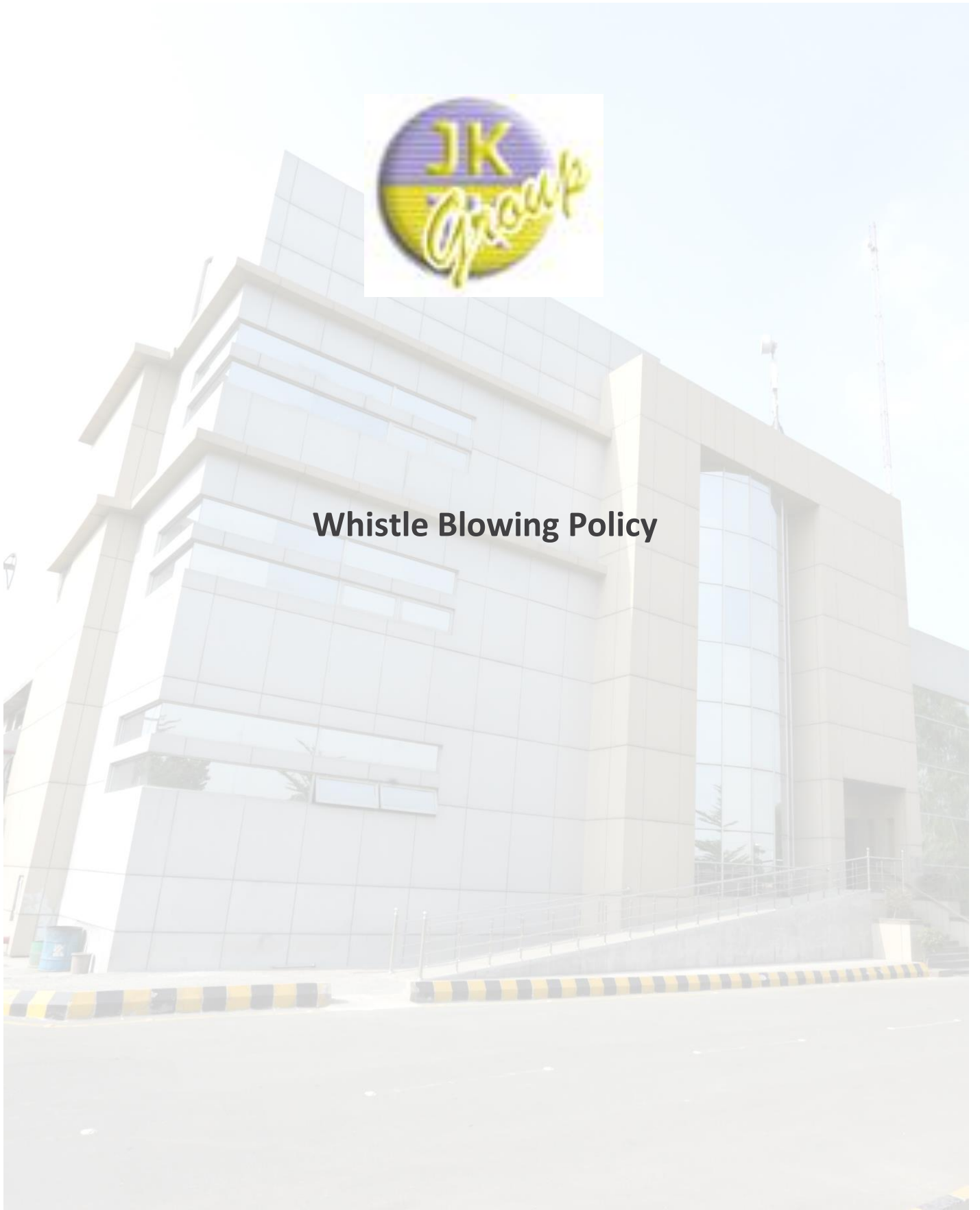




Whistle Blowing Policy



J.K. SPINNING MILLS LIMITED

WHISTLE BLOWING POLICY

Objectives:

The purpose of this policy is to encourage and enable employees of the company to report any unethical, illegal, or inappropriate conduct within the Company, without fear of retaliation. It ensures that whistleblowers are protected and that their concerns are properly addressed through a structured process.

Scope:

This policy applies to all employees of J.K. Spinning Mills Limited, including:

- Permanent staff
- Contractual employees
- Temporary workers
- Part-time employees
- Any other individuals engaged by the Company (e.g., consultants, contractors)

It covers all types of misconduct, such as:

- Financial fraud or misappropriation
- Corruption or bribery
- Breach of Company Policies
- Discrimination, harassment, or workplace bullying
- Environmental violations
- Health and Safety Risks
- Any act harming the Company's interests or reputation

Definitions:

Whistleblower: An employee or individual who reports any misconduct, illegal activity, or policy violations.

Misconduct: Includes unethical behavior, fraud, corruption, policy violations, or any act that could harm the Company, employees, or stakeholders.

Designated Officer: The individual responsible for receiving and investigating whistleblowing reports (e.g., Head of HR, Head of Internal Audit or Head of Legal & Corporate Affairs).

Reporting Procedure:

Employees should report any concern regarding unethical or illegal conduct via one of the following channels:

Anonymous Reporting: Whistleblowers can report anonymously if they choose. However, providing contact details will allow for better communication during the investigation.

Who to Report To: Concerns should be reported directly to one of the following:

Head of Human Resources (HR)

Head of Internal Audit

Head of Legal & Corporate Affairs

How to Report:

- **In-person:** Report the issue directly to the designated officer.
- **Email:** Concerns can be sent to a confidential email to hr2@ikgroup.net.
- **Phone:** Employees can use official extension lines of above deputed personnel.
- In case a concern is against any member of the Whistle Blowing Committee itself, the same may be reported directly to the Managing Director or the CEO.

Confidentiality:

All whistleblowing reports will be treated with the highest level of confidentiality. The identity of the whistleblower will not be disclosed unless required by law or essential for the investigation. Every effort will be made to ensure the whistleblower remains anonymous, if requested.

Investigation Process:

Upon receiving a whistleblowing report, the designated committee will initiate the following steps:

1. **Acknowledgment:** If contact details are provided, the whistleblower will receive acknowledgment of the report.
2. **Initial Assessment:** Initial inquiries / assessments will be made by Head of Internal Audit in consultation with other members to assess the nature of the complaint to determine whether it requires a formal investigation.

3. **Formal Investigation:** If warranted, a formal investigation team will be assembled, potentially including members from the Internal Audit, Legal, and HR departments. The investigation should be conducted impartially and objectively.
4. **Outcome:** Upon conclusion of the investigation, appropriate actions will be taken, which may include:
 - 4.1. Disciplinary action against the perpetrator.
 - 4.2. Revisions to Company Policies.
 - 4.3. Legal or regulatory reporting if necessary.
5. **Feedback to Whistleblower:** If applicable, the whistleblower will be informed of the general outcome, without revealing confidential information or details that could harm the investigation or privacy of involved parties.
6. **Feedback to Management:**
 - 6.1. At the end of the investigation, a written report that provides the findings, basis of findings and a conclusion is to be submitted to the Managing Director & CEO.
 - 6.2. Whistle blowing committee should mutually decide about disposal of the concern and disseminate messages across the company for avoidance of such incidents in the future.
 - 6.3. Whistle blowing committee will recommend to CEO / MD for further investigation if required. In case of split decision, the case will be referred to CEO / MD.
 - 6.4. Head of Internal Audit will produce a quarterly report documenting all concerns and the actions taken to resolve them for the review of CEO / MD.

Protection Against Retaliation:

J.K. Spinning Mills Limited strictly prohibits any form of retaliation against whistleblowers.

Retaliation includes:

- **Dismissal or Demotion:** No whistleblower will be dismissed or demoted due to their reporting.
- **Harassment:** The whistleblower will not face any form of harassment, bullying, or workplace discrimination.
- **Threats or Coercion:** No threats or coercion will be tolerated against whistleblowers or those cooperating in the investigation.

Any employee found retaliating against a whistleblower will face disciplinary action, up to and including termination.

Malicious and False Reporting:

While the Company encourages good faith reporting of concerns, it does not tolerate malicious or false reports made with intent to harm others. Employees who intentionally submit false claims will be subject to disciplinary action.

Responsibilities:

Employees: Responsible for reporting any concerns regarding unethical or illegal activities.

Designated Officers: Responsible for receiving and investigating complaints, maintaining confidentiality, and ensuring proper action is taken.

Management: Responsible for promoting a culture of transparency and integrity and ensuring no retaliation occurs.

Monitoring and Review:

This policy will be reviewed periodically (annually or as required) to ensure it remains effective and up-to-date with legal and regulatory requirements. The company reserves all the rights to amend or modify this policy at any time to meet changing needs.