



NCC BLUEWATER PRODUCTS LTD.

Whistleblower Policy

1. Philosophy and objective

The objective of this policy is to provide Employees (permanent or on contract), Directors, and other stakeholders (hereinafter collectively referred to as stakeholders) an avenue to raise concerns, in line with the commitment of NCC Bluewater Products Limited to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.

2. Policy

- To investigate such reported incidents in a fair manner;
- To take appropriate disciplinary action against the delinquent employee(s);
- To ensure that no employee is victimised or harassed for bringing such incidents to the attention of the Company.

The practice of this Policy will be overseen by the Audit Committee.

4. Reporting Mechanism

- a. Stakeholders are encouraged to bring to the attention of the Company incidents pertaining, inter alia, to:
 - Illegal or unethical conduct including that which adversely affects the business performance or image or reputation of the Company;
 - Violation of any law or regulation including actual or suspected fraud;
 - Conflict of interest with the Company;
 - Leaking of confidential or proprietary information of the Company;
 - Any other violation of the NCCBPL Code.

A Whistleblower complaint may be made by any stakeholder (hereinafter referred to as the 'complainant'). Such complaint should be sent to investors@nccbpl.com.

5. Investigation

- Upon receipt of a complaint, the Designated Director will make an assessment thereof and on being satisfied as to the seriousness and credibility of the complaint, direct the complaint for investigation.
 - All employees have a duty to cooperate in an investigation.
 - All information disclosed during the course of an investigation, including the identity of the complainant, will be kept confidential, except as necessary or appropriate to disclose for the purposes of the investigation or where required to be statutorily disclosed.
 - The enquiry shall be conducted and a report be submitted within 30 to 45 working days from the date of the initial complaint.
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6. No Retaliation

- This Policy is intended to encourage and enable employees to raise bonafide concerns. No employee who reports a violation shall suffer any harassment.

7. Complaint to be made in good faith

- A complainant must act in good faith and have reasonable grounds for forming a belief that his or her complaint constitutes a violation as described under Clause 3(a).
- This Policy must not be used as a tool for victimisation, making false allegation or acting malafide.

8. Amendments in Law

Any subsequent amendment / modification in the listing agreement and / or other applicable laws in this regard shall automatically apply to this Policy.

9. Notification

The new employees shall be informed about the policy a copy of the same will be posted on the website of the company.

10. A report by the Designated Director shall be submitted to the Audit Committee on a quarterly basis.

11. Contact Details

Chairman of the Audit Committee:

Address: NCC Bluewater Products Limited NCC House, Madhapur, Hyderabad – 500 081

Email : investors@nccbpl.com.
