ETHICS & WHISTLE BLOWER POLICY

TRANSPORT CORPORATION OF INDIA LIMITED

Version: 3.0

1. Preface

i. In spirit and deed Transport Corporation of India Ltd ("TCI"/ "the Company" is committed to conducting its affairs in a fair and transparent manner by adopting highest standards of professionalism by inculcating honesty, integrity, ethical behavior and zero tolerance for bribery and corruption in its business activities.

ii. The Company is also committed to develop a culture which is safe for all employees to raise concerns about any unethical or unacceptable practice, any event of misconduct or fraud.

iii. The Company encourages Directors and Employees to act vigilantly, honorably in all business dealing of the Company in good faith and to comply with laws against bribery & corruption.

iv. Section 177(9) of the Companies Act, 2013 & Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 along with mandatory requirement of SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015 inter-alia, provides for every listed company to adopt and establish Vigil Mechanism/Whistle Blower Mechanism for its directors and employees to report their genuine concerns or grievances and instances of unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct.

v. Being a listed company, TCIL has established a Vigil Mechanism and formulated this Whistle Blower Policy.

2. Policy

i. This Policy applies to Directors and individuals at all level and grades, including employees (whether permanent, fixed-term or temporary), consultants, suppliers, contractors, trainees or any other person associated with the Company.

ii. The Policy intends to take action against any individual(s) involved in practices that are abusive, corrupt, or leading to anti- competition, bribery. The mechanism provides for the procedures for reporting, initiating inquiry and safeguards against victimization of person who uses such mechanism and also provides for direct access to the Chairman of the Audit Committee in exceptional cases.

iii. This neither releases Directors and the employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations against people in authority and / or colleagues in general.

iv. The Policy intends to cover serious concerns that may have a large impact on affairs / image of the Company. It has been drawn up in a manner so that Employees and Directors can be confident about raising a concern. The concern areas covered by this Policy are provided in this policy.

3. Definitions

i. "Alleged Wrongful Conduct" shall mean violation of law, misuse or abuse of authority, fraud or suspected fraud, any deliberate concealment of such abuse of fraud, infringement of Company's rules, misappropriation of funds, actual or suspected fraud, substantial and

specific danger to public health and safety or abuse of authority or violation of the company's code of conduct or ethics policy.

ii. "Bribery" is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. A bribe may be anything to value and not just money-gifts, insider information, sexual or other favour, corporate hospitality or entertainment, use of Company resources, entertainment or other items of value, abuse of function and can pass directly or through third party.

iii. "Corruption" includes wrongdoing on the part of any person or an authority or those in power through means that are anti-competitive, illegitimate, immoral or incompatible with the ethical standards. Corruption often results from patronage and is associated with bribery.

iv. "Disciplinary Action" means any action that can be taken on the completion of / during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.

v. "Directors" means all the present directors of the Company.

vi. "Employee" means every present employee on the permanent or temporary rolls of the Company.

vii. "Ethics Committee" means the committee constituted by the Company to oversee and facilitate the investigation of Protected Disclosures under this Policy. The Board of Directors may, from time to time, determine or revise the composition of the Ethics Committee, including the appointment of its Convener, as considered appropriate.

viii. "Gifts" means and includes providing, soliciting or accepting cash or its equivalent, entertainment, favors or anything of substance to or from competitors, vendors, suppliers, customers or others that do business or are trying to do business with the Company. It can be both direct and indirect, present or promised.

ix. "Kickback" means an illicit payment made to someone in return for facilitating business favor/ advantage / in exchange for making the deal.

x. "Facilitation Payments' means typically small, unofficial payments (sometimes known as "grease payments") made to secure or expedite a routine government action by a government official.

xi. "Investigation Subject" means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

xii. "Investigators" means those persons appointed by the Ethics Committee, who may or may not be members of Ethics Committee, required for assistance in the investigation of the Protected Disclosure and who submit their findings to the Ethics Committee.

xiii. "Ombudsperson" will be a person, who will be authorized for receiving/oversee all complaints under this Policy and ensuring appropriate action. The Audit Committee shall have the authority to appoint or change the Ombudsperson from time to time.

xiv. "Policy" means Ethics and Whistle Blower Policy.

xv. "Protected Disclosure" means a concern raised by Director(s) or an employee or group of employees of the Company, through a written communication and made in good faith which discloses or demonstrates information about an activity covered under the definition of Alleged Wrongful Conduct under the scope of the Policy with respect to the Company. However, the Protected Disclosures should be factual and not speculative or in the nature of an interpretation / conclusion and should contain as much specific information as possible to allow for proper assessment of nature and extent of the concern.

Provided that any concern/complaint which is received at any sort of social media platform shall not be treated as Protected Disclosure under this policy.

xvi. "Protected Disclosure Form" is a form by which a submission is made to the Company regarding this Policy and is available at the Company's website.

xvii. "Associate" means any individual or organization, who/which enter into any contact or transaction with the Company and also includes actual and potential clients, suppliers, business contactors, consultants, intermediaries, subcontractors, agent, advisors, joint ventures and government & public bodies (including advisers, representatives and officials) and/ their representatives.

xviii. "Whistle Blower" means a Director(s) or an employee or group of employees of the Company or an associate making a Protected Disclosure under this Policy and also referred to as Complainant.

4. Scope of the Policy

This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of Company rules, codes, manipulations, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of which the interest of the Company is affected and formally reported by whistle blowers.

Policy should not be used as Company's grievance procedure or be a route for raising malicious or unfounded allegations against colleagues.

5. ***Code of Ethics***

What is not acceptable?

Any offer made, directly or indirectly, any form of gift, entertainment or anything of value to any Third Party with a purpose or intention to:

i. Obtain or retain business;
ii. Influence business decisions; or
iii. Secure an unfair advantage

None of the individual(s) covered under this Policy shall:-

i. Accept an offer of a gift, entertainment or anything of value (whether directly or indirectly) of any size from any Third Party which is in negotiation with, or is submitting/ has submitted a proposal to the Company with respect to any commercial transaction.

ii. Give, promise to give or offer, any payment, gift, hospitality or advantage with an expectation or hope that a business advantage will be given or received or to reward a business advantage already given.

iii. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.

iv. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that is known or suspected of being offered with the expectation that it will obtain a business advantage for them.

v. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy.

vi. Engage in any activity that might lead to a breach of this Policy.

The points stated above are illustrative in nature and in no way intend to limit the applicability of the code.

Gifts and Hospitality:

In connection with certain holidays, meetings and other occasions, it is customary in many parts of the world to give gifts of nominal value to customers, government officials and other parties who have or may have a business relationship with the Company.

This policy does not prohibit normal business hospitality and offering gifts, so long as it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations.

- **Must be duly approved**: Normal business hospitality must always be approved at the appropriate level of Company management.

- **Must not be intended to improperly influence:** One should always assess the purpose behind any hospitality or entertainment. Hospitality or entertainment with the intention of improperly influencing anyone's decision-making or objectivity, or making the recipient feel unduly obligated in any way, should never be offered or received. It should always be considered how the recipient is likely to view the hospitality. Similarly, one must also decline any invitation or offer of hospitality or entertainment when made with the actual or apparent intent to influence their decisions.

- **Must not have the appearance of improper influence:** Gifts can in some cases influence, or appear to influence, decision-making, for example by persuading the recipient to favour the person who made the gift over his own employer. Employee should think very carefully before making, or receiving, gifts. Gifts can occasionally be offered to celebrate special occasions (for example religious holidays or festivals etc.) provided such gifts are of nominal value and are occasional, appropriate, totally unconditional, and in-fitting with local business practices. No gift should be given or accepted if it could reasonably be seen improperly to influence the decision-making of the recipient.

- **Certain gifts are always prohibited:** Some types of gifts are never acceptable including gifts that are illegal or unethical, or involve cash or cash equivalent. Furthermore, by way of non-exhaustive example, an invitation to his/her family to join him on a foreign business trip, or the extension of a trip at the customer's expense to include a holiday, are at all times unacceptable, and employees should not participate in such practices.

- **Modest promotional gifts are permitted:** It is acceptable to offer modest promotional materials to contacts e.g. branded pens. Use of one's position with the Company to solicit a gift of any kind is not acceptable. However, the Company allows associates occasionally to receive unsolicited gifts of a very low intrinsic value from business contacts provided the gift is given unconditionally and not in a manner that could influence any decision-making process.

- **Personal payment strictly not advisable:** One should never pay on his/her personal account for gifts or hospitality in order to avoid this policy.

In some cultures / countries, it may be seen as an insult to reject a gift, and refusals may adversely affect business relationships. In these circumstances, and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned. If your reporting manager is uncertain how to treat the gift, s/he should seek clarification from the Ethics Committee.

Gifts & Hospitality can put the Company at risk if used to facilitate unethical business practices. The Company has developed procedures for giving and receiving gifts and hospitality which will seek to ensure that individuals act ethically and otherwise comply with the Anti-Corruption and Bribery Policy

and Code of Ethical Business when giving and receiving gifts and / or hospitality. These procedures will be followed by associates.

Facilitation and Kickbacks

Neither an employee of Company nor any person acting on behalf of Company shall themselves make and/ or accept facilitation payments or "kickbacks" of any kind nor allow third parties acting on their behalf or on behalf of the Company, such as agents, consultants, suppliers and contractors to make any such payments.

Any activity that might lead to or suggest that a Facilitation Payment or Kickback will be made or accepted by Company, must be avoided absolutely.

Political Activities

The Company is apolitical, advocates government policies on sustainability and does not contribute financially or in- kind to political parties, politicians and related institutions in India or abroad.

Payment or use of corporate assets of any type as payment, directly or indirectly to any person, business, political organization or public official for any unlawful or unauthorized purpose is prohibited. All the employees of the Company are strictly prohibited from making any political contribution or indicate any representation of about a candidate for office or any political cause or decision of any government on behalf of Company, use any of Company's resources to assist a candidate or elected official in any campaign or coerce or direct another employee to vote a certain way.

Business Relations

The Company expects all Third Parties doing business with Company to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy.

In order to maintain the highest standards of integrity, with respect to any dealings with a Third Party, every Employee & associates of the Company must ensure that:

i. they conduct due diligence enquiries to review the integrity records of any Third Party before entering a commercial relationship with them.
ii. the engagement process and the final approval of the selection of any Third Party is completely documented.
iii. they implement a program to provide appropriate information on this Policy to all Third Parties engaged in business relationship with Company.
iv. each Third Party within their work area is fully briefed on this Policy and has made a formal commitment to abide by it.
v. fees and commissions agreed will be appropriate and justifiable remuneration for legitimate services rendered.
vi. contractual agreements will include appropriate content, enabling the Company to withdraw from the relationship if any of the Third Parties fail to abide by this Policy.

In the event of any doubt on the integrity of a Third Party, it is the employee's esponsibility to intimate his / her immediate supervisor as soon as possible.

Anti-Competition

The Company ensures free and fair market benefits and ensures that the clients receive the best quality products and services at the best prices. The individual(s) covered under the Policy should not engage in practices that are abusive, corrupt, or anti-competition, including carrying out unfair acts in the market. Every employee shall strive to ensure healthy relationships with the customers, competitors, suppliers, distributors and resellers.

Offset or Similar Obligations

Many government contracts (particularly in defense/ aeronautics sector) require companies to make offset commitments. The purpose of these offset commitments is to invest in the country and create local jobs. Similarly, a government in a country or a particular state giving a grant or other facilities to Company may require preference to be given to the residents of such country or state in any hiring. All these transactions per se do not violate this Policy. In case there is an iota of doubt regarding any violation of this Policy at any stage of the transaction, employees are strongly encouraged to connect with the Ethics Committee.

6. Principles of Vigil Mechanism/Whistle Blowing

i. To ensure the implementation of the principles of this Policy and to assure that the concern will be acted upon seriously, the Company will:

   a. Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for doing so;
   b. Treat victimization as a serious matter including initiating disciplinary action on such person/(s);
   c. Ensure complete confidentiality.
   d. Not attempting to conceal evidence of the Protected Disclosure;
   e. Take Disciplinary Action, if anyone destroys or conceals evidence of the Protected Disclosure made/to be made;
   f. Provide an opportunity of being heard to the persons involved especially to the Investigation Subject;
   g. The information provided should be on the basis of direct first-hand experience of the Whistle Blower. It should not be based on any secondary, unreliable source such as grapevine or any other form of informal communication.
   h. Whistle Blowers shall not act on their own in conducting any investigation.
   i. If the Whistle Blower chooses not to disclose his/her identity to the Ombudsperson, the authenticity of the Whistle Blower's identity will be established by the Ombudspersons' office before considering the case for the purpose of investigation. This shall be done through the contact details provided by the Whistle Blower in the Protected Disclosure Form, while maintaining confidentiality.
   j. The Protected Disclosure made by the Whistle Blower must be genuine with adequate supporting data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature or was not genuine, the Whistle Blower shall be subjected to the requisite disciplinary action in this regard.

k. The Whistle Blower may also choose to be anonymous. However, it may sometimes be difficult or even impossible to thoroughly investigate the disclosures that are made anonymously. The Whistle Blower is, therefore, strongly encouraged to share his/her identity when making the disclosures.

l. In case of anonymous disclosure, Ombudsperson shall, at his end, examine the possible intentions & genuineness of the disclosure in advance before going ahead with the investigation. In case Ombudsperson suspects that the allegation has been made with mala-fide intentions or is frivolous in nature or is not genuine, he can decide to drop the case.

m. The Company should strive to maintain confidentiality to the greatest extent possible and discussion of the concern should be limited to only those individuals involved in the matter and on a need to know basis.

n. The confidentiality of Whistle-Blower shall be duly maintained, and he/she shall be protected from any retaliation during investigation and thereafter

7. Disqualifications

i. While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant Disciplinary Action.

ii. Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

iii. Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide or malicious, shall be liable to be prosecuted under the appropriate law of the land.

8. Procedure for raising concern

The Ombudsperson is :
Name: Mr. Naveen Gupta
Title: Head - Internal Audit

i. Concerns can be emailed or posted in a closed and secured envelope to Ombudsperson in the Protected Disclosure Form, as per the below mentioned details:
Mr. Naveen Gupta
Transport Corporation of India Limited
Postal Address: TCI House, 69, Institutional Area, Sector-32, Gurugram-122001
nvn_gupta@hotmail.com.

ii. Protected Disclosure against the Ombudsperson should be addressed to the Chairman of the Audit Committee. The Chairman of the Audit Committee can be contacted at the E-Mail ID raviuppal52@gmail.com.

iii. The envelope should be super scribed, and email should contain subject as “Protected Disclosure under the Whistle Blower Policy”. If the complaint is not super scribed and closed or email is not containing subject as mentioned above it will not be possible for the Ombudsperson / Ethics Committee / Chairman of the Audit Committee to protect the Complainant and the Protected Disclosure will be dealt with as if a normal disclosure.

iv. In order to protect identity of the Complainant, the Ombudsperson / Ethics Committee / Chairman of the Audit Committee will not issue any acknowledgement to the

Complainant and the Complainants are advised neither to write their name / address on the envelope nor to enter into any further correspondence with the Ombudsperson / Ethics Committee / Chairman of the Audit Committee. In case of any further clarification, Ombudsperson / Ethics Committee / Chairman of the Audit Committee shall get in touch with the Complainant in a manner deemed fit.

v. The Protected Disclosure should be forwarded under a covering letter signed by the Complainant. The Ombudsperson / Ethics Committee / Chairman of the Audit Committee shall detach the covering letter bearing the identity of the whistle blower and process only the Protected Disclosure.

vi. Employees/directors can make Protected Disclosure to Ombudsperson, as soon as possible but not later than 30 consecutive days after becoming aware of the concern so as to ensure a clear understanding of the issues raised.

vii. Protected Disclosure should either be typed or written in a legible handwriting in English or in Hindi, to the Ombudsperson, or the Chairman of the Audit Committee.

viii. Whistle Blower must provide his/her background, history and reason for the concern, together with name, date, place and other possible information. For the purpose of proper & fair investigation, all necessary details shall be captured by the Whistle Blower in a standard format, namely the Protected Disclosure Form. In case of anonymous disclosure, the Whistle Blower can choose to leave the personal details on first page of Protected Disclosure Form blank.

9. Access to Chairman of the Audit Committee

The Whistle Blower shall have right to access Chairman of the Audit Committee directly in exceptional cases and the Chairman of the Audit Committee is authorized to prescribe suitable directions in this regard**.**

10. Investigation

i. All protected disclosures under this policy will be recorded and thoroughly investigated. If initial enquiries by Ombudsperson indicate that the concern has no basis, or it is not a matter to be investigation pursued under this Policy, it may be dismissed at this stage and the decision is to be documented.

ii. Where initial enquiries indicate that further investigation is necessary, this will be carried through either by the Ombudsperson alone or by the Ombudsperson in coordination with the Ethics Committee.

iii. The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt.

iv. The investigation shall be completed normally within 30 days of receipt of the Protected Disclosure and any delay beyond 30 days will be justified in the investigation report.

11. Documentation and Reporting

i. On receipt of the Protected Disclosure, written report of the findings would be made by the Ombudsperson to the Ethics Committee. The record would include:
   a. Facts of the Matter
   b. Whether the same Protected Disclosure was raised previously by anyone, and if so,

the outcome thereof;

c. Whether any Protected Disclosure was raised previously against the same Investigation Subject;
d. The financial/ otherwise loss which has been incurred / would have been incurred by the Company.
e. Details of actions taken by the Ombudsperson / Ethics Committee for processing the complaint
f. Findings of Ethics Committee;
g. Impact Analysis (If applicable).
h. The recommendations of the Ethics Committee on disciplinary/other action/(s).
i. The timeline for final decision of investigation (Maximum 30 days).

ii. On submission of report, the Ethics Committee shall discuss the matter & may:
   a. In case the Protected Disclosure is proved, accept the findings and take such Disciplinary Action as it may think fit and take preventive measures to avoid recurrence of the matter;
   b. In case the Protected Disclosure is not proved, extinguish the matter;
   Or
   a. Depending upon the seriousness of the matter, the Ethics Committee may refer the matter to the Audit Committee with proposed disciplinary action/counter measures. The Audit Committee, if deems fit, may call for further information or particulars from the complainant. In case the Audit Committee thinks that the matter is too serious, it can further place the matter before the Board with its recommendations. The Board may decide the matter as it deems fit.

iii. In exceptional cases, where the Whistle Blower is not satisfied with the outcome of the investigation and the decision, s/he can make a directly appeal to the Chairman of the Audit Committee.

12. Protection

i. No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy.

ii. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower. Complete protection will, therefore, be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behavior or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Protected Disclosure.

iii. As a matter of general deterrence, the Company shall publicly inform employees of the penalties imposed and discipline of any person from misconduct arising from retaliation.

iv. Any investigation into allegations of potential misconduct will not influence or be influenced by any disciplinary or redundancy procedures already taking place concerning an employee reporting a matter under this policy.

v. A Whistle Blower may report any violation of these clauses to the Chairman of the Audit Committee, who shall investigate into the same and recommend suitable action to the management.

vi. The Company will take steps to remove difficulties if any, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure etc.

vii. The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. The identity of the Complainant will not be revealed unless he himself has made either his details public or disclosed his identity to any other officer or authority. In the event of the identity of the complainant being disclosed, the Audit Committee is authorized to initiate appropriate action as per extant regulations against the person or agency making such disclosure. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement agencies, in which case members of the organization are subject to subpoena.

viii. Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower.

13. Investigation Subject

i. An Investigation Subject shall be duly informed about the Protected Disclosures made against them at the commencement of the formal investigation process and shall have regular opportunities for providing explanation during the course of investigation process.

ii. No Investigation Subject shall directly/indirectly interfere with the Investigation process, till the completion of the Investigation.

iv. The Investigation Subject shall not destroy or tamper with any evidence and shall have a duty to co-operate with the Ethics Committee and Investigators involved in the inquiry till the Investigation process is complete.

v. During the course of Investigation, all Investigation Subjects shall have right to consult any person(s) of their choice, other than the Ombudsperson/investigators and/or the Ethics Committee and engage any legal counsel at their own cost to represent them in the Investigation Report.

vi. All Investigation Subjects shall have a right to be informed about the results of the Investigation process in writing by the Ethics Committee after the completion of the inquiry. They will be given an opportunity to respond to the inquiry results, as contained in the Investigation Report.

vii. Where the results of the Investigation highlight that the allegations made against the Investigation Subject are eventually dismissed as untenable, then the Company shall reimburse all such reasonable costs as shall have been incurred by the Investigation Subject to defend him/her, during the process of Investigation.

viii. In such cases, the Investigation Subject should also be consulted whether a public disclosure of the Investigation result would be in their best interest. The Ethics Committee shall have the final discretion on whether such disclosure is necessary and if yes, then on the scope and medium of such disclosure.

14 Ombudsperson and Convener Responsibility

i. The Ombudsperson is duly authorized by the Audit Committee to receive/oversee any Protected Disclosures reported under this Policy. He is responsible for ensuring appropriate action.

ii. The Ethics Committee, under the leadership of the Secretary, may consider involving Investigators for the purpose of conducting the Investigation. However, the investigations shall be launched only after the review of Protected Disclosure by the Ombudsperson, which establishes that :

   a. The Protected Disclosure made constitutes an unethical practice, as defined under this Policy.

   b. The Protected Disclosure made is supported by adequate information to support an investigation.

iii. In case of anonymous disclosure, Ombudsperson shall, at his end, examine the possible intentions and genuineness of the disclosure in advance before going ahead with the investigation. In case, the Ombudsperson suspects that the allegation has been made with mala- fide intentions or is frivolous in nature, or is not genuine, he can decide to drop the case, along with taking appropriate Disciplinary Action against such Whistle Blower.

15. Investigators

i. The Investigator(s) shall conduct the inquiry in a fair and unbiased manner.
ii. The Investigator(s) shall ensure complete fact finding.
iii. The Investigator(s) shall maintain strict confidentiality at all times.
iv. The Investigator(s) shall derive the outcome of the inquiry and recommend appropriate course of action.

16. Secrecy / Confidentiality

The Whistle Blower, the Investigation Subject, the Ethics Committee, the Ombudsperson and everyone involved in the process shall:

i. maintain complete confidentiality/ secrecy of the matter

ii. not discuss the matter in any informal/social gatherings/ meetings
iii. discuss only to the extent or with the persons required for the purpose of completing the process and investigations
iv. not keep the papers unattended anywhere at any time
v. keep the electronic mails/files under password

If any person is found not complying with the above, he/ she shall be held liable for such disciplinary action as is considered fit.

17. Reporting & Retention of Documents

i. The Ethics Committee shall submit a quarterly report to the Audit Committee and the Board about all Protected Disclosures referred to them under the Policy and their outcome, if any.

ii. The related documents need to be preserved for minimum of 08 years from the date of final Reporting or such other period as specified by any other law in force, whichever is longer.

18. Communication

A Whistleblower Policy cannot be effective unless it is properly communicated to Directors and employees. They shall be informed of the same by publishing in notice board or other suitable means and also posting on the website of the Company.

19. Amendment(s)

The Company reserves the right to amend or modify this Policy in whole or in part, at any point of time. Any amendment to the Policy shall take effect from the date when it is approved by the Audit Committee of the Company and hosted on the Company website.

Protected Disclosure Form

For Employees/Directors of Transport Corporation of India Limited:

Name of the Whistle Blower: ……. Designation …….

Department: …… Job class/ Grade: ……

Location: …… Date of Joining/Appointment: ……..

Contact Number: …….. E-mail: ……

Correspondence address: ……

……

……

I hereby declare, that the accompanying statements and supporting documentation (if any) is true and correct, to the best of my knowledge and in complete good faith.

Date :_____

Signature of the Whistle Blower

NOTE: IN CASE OF ANONYMOUS DISCLOSURE, LEAVE THIS PAGE OF PROTECTED DISCLOSURE FORM BLANK.

Name of the Investigation Subject: ……. Designation: ……
Department: …….. Job class/ Grade: ……
Location: ……
<u>In case of Multiple Subjects</u>
Name of the 2nd Investigation Subject: …… Designation: ……
Department: …….. Job class/ Grade: ……
Location: ……
Name of the 3nd Investigation Subject: …… Designation: ……
Department: …….. Job class/ Grade: ……
Location: ……
(If the space provided is not sufficient, attach a separate sheet)
Nature of "Code of Conduct" Violation: Sequence of events (please provide Date/ Time/ Place):
Source of Information:
Role of the Subject(s): Other Individuals involved:
Perceived Outcome of the Violation:
Any Other information that you may like to provide:
List of Attachments: 1. …… 3. …… 2. …… 4……