

## Whistle Blower Policy 2015 amended 2017

### 1. Preface

The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. Towards this end, the Company has adopted various policies and procedures relating to its operations namely HR, Accounting, and Purchase and has defined the authority limits of all its Key Management Personnel including the Board of Directors and the Sub-committees of the Board. These govern the actions of the Company, its Employees and its Board. Any actual or potential violation of these, howsoever insignificant or perceived as such, would be a matter of serious concern for the Company. The role of the Employees in pointing out such violations same cannot be undermined.

Keeping the above the Company has decided to adopt a Whistle Blower Policy to protect the interest of the company against any violations of the operating policies and procedures which define the conduct of the employee and Directors.

### 2. Definitions

- **Employee:** means every employee of the Company including any of the directors in the employment of the Company.
- **Protected Disclosure:** means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- **Subject:** means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.
- **Whistleblower:** means an Employee or Director and Other stakeholders namely Customers, Suppliers, Shareholders, Banks making a Protected Disclosure under this Policy
- **Investigators** mean those persons authorized, appointed, consulted Chairman of the Board of Directors includes but not limited to the, Legal Consultant, Statutory Auditors of the Company and the police.
- **Other Stakeholders** covers Customers, Suppliers, Shareholders Banks etc.

3. **Procedure:** Whistleblower Policy (“the Policy”) has been formulated with a view to provide a mechanism for directors and Employees or **Other stakeholders** of the Company to approach the Chairman of the Board of Directors or Chairman of the Audit Committee of the Company.

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- Appropriate care must be taken to keep the identity of the Whistleblower confidential.
- **The Whistle Blower can send his concern either in a sealed Confidential Cover or to the direct email address of the Chairman or Chairman of the Audit Committee. ( Annexure A below states the contact details of the of the Chairman and Audit Committee Chairman)**
- Protected Disclosures should be reported in writing to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English or in Arabic.
- The Protected Disclosure should be forwarded under a covering letter/ email identity which may bear the identity and contact details of the Whistleblower. The Chairman shall detach the covering letter/ email identity and forward only the Protected Disclosure to the Investigators for investigation.
- Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.
- While 100 % surety is not required however Whistle blower should ensure that he is genuine in his concern and has reasonable ground to believe that something is wrong and reports in good faith.
- The Whistleblower may disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will also be entertained. However it may not be possible to interview the Whistleblower and grant him/her protection under the policy
- The identity of a Subject will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- Unless there are compelling, reasons not to do so, subjects will be given the opportunity to respond to material findings contained in an investigation report.
- Subject has a right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Subject and the Company.

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- The investigation shall be completed normally within 45 days of the receipt of the Protected Disclosure

#### 4. Disqualification

- While it will be ensured that genuine Whistleblower are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action. However in such event a reasonable opportunity should be given to elucidate his/hers genuineness and reporting in good faith.
- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus or with a mala fide intention.
- Whistleblower, who make three or more Protected Disclosures, which have been subsequently found to be mala fide, frivolous, baseless, malicious, or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy. In respect of such Whistleblower, the Chairman would reserve its right to take/recommend appropriate disciplinary action.

5. **Decision:** If an investigation leads the Chairman to conclude that an improper or unethical act has been committed, Chairman shall recommend to the management of the Company to take such disciplinary or corrective action as the Chairman deems fit.

6. **-Record of Findings:** *The Legal consultant or any other independent authority as defined by the chairman may be responsible for maintaining a logbook of all reports received, tracking their receipt, investigation and resolutions*

7. **Availability of the policy:** This policy shall be available at the company's website, company intranet, company notice boards and hard copy shall be available from HR department.

8. **Awareness of the Policy:** The management shall ensure periodic awareness/training of the employees (existing or new) to ensure effectiveness of the policy

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Approved by the Board of Directors through Circulation

FOR AND ON BEHALF OF BOARD OF DIRECTORS OF MAJAN GLASS  
COMPANY SAOG



Mr. Anwar Sultan

Chairman



Mr. Deepak A. Adnani

FC and Company Secretary

Dated: 15 Feb 2017  
Amended: 25 July 2017

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### ANNEXURE A TO THE WHISTLE BLOWER POLICY – 2017

#### Contact Details of the Chairman of the Board of Directors

Sr. No	Particulars	Details
1	Name	Mr. Anwar Ali Sultan
2	Designation	Chairman
3	Company	W.J Towell & Co LLC
4	E Mail ID	<a href="mailto:tbanwar@omantel.net.om">tbanwar@omantel.net.om</a>
5	Telephone No	245626064 ; 24526065
6	Fax	24526050

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### Contact Details of the Chairman of the Audit Committee

Sr. No	Particulars	Details
1	Name	Mr. Ali Mohd. Redha Jaffar
2	Designation	Chairman Audit Committee
4	Company	Ministry of Finance
5	E Mail ID	amrj363@yahoo.com
6	Telephone No	24746514 ; 24746504;
7	Fax	24737840