

THE SOUTH INDIA PAPER MILLS LIMITED

CIN: L85110KA1959PLC001352

Regd office: Chikkayanachatra, Nanjangud – 571302, Karnataka

WHISTLEBLOWER POLICY

The Companies Act, 2013 and revised clause 49 of the Listing Agreement provide that every listed Company shall establish a vigil mechanism for Directors and employees to report to the management instances of unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct or ethics policy. Accordingly as a part of corporate governance practices, the Company has adopted the Whistle Blower Policy that covers the Directors and employees to provide safeguards to employees who report about unethical behavior to the Company.

'Employee' means all permanent employees of the Company.

'Company' refers to The South India Paper Mills Limited

'Whistle blower' is an employee or group of employees who makes a Disclosure / reporting under this policy

The Purpose of this Policy

The Company is committed to complying with the domestic laws that apply to the Company satisfying the Company's Code of Conduct and Ethics, and particularly to assuring that business is conducted with integrity and that the Company's financial information is accurate. To promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (the "Policy" or the "Whistleblower Policy").

Duty to Report

Everyone is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company's Code of Conduct and Ethics. It is important that the employees report all suspected violations. This includes possible accounting or financial reporting violations, insider trading, bribery, or violations of the anti-retaliation aspects of this Policy. Retaliation includes adverse actions, harassment, or discrimination in the employment relating to the employee's reporting of a suspected violation.

It is the policy of the Company that the employee must, when he/she reasonably suspects that a violation of an applicable law or the Company's Code of Conduct and Ethics has occurred or is occurring, report that potential violation. Reporting is crucial for early detection, proper investigation and remedial action, and deterrence of violations of Company policies or applicable laws. The employee should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company

policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.

How to Report

The employee must report all suspected violations to (i) the his/ her immediate supervisor; (ii) the Chief Compliance Officer.

If there is reason to believe that the employee's immediate supervisor or the Chief Compliance Officer is involved in the suspected violation, the report may be made to the Chairman of the Audit Committee of SIPM Ltd.

The report should include as much information about the suspected violation as the employee can provide. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. Whenever the report is made, the employee may be contacted for further information.

Investigations after Reporting

All reports under this Policy will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. Everyone working for or with the Company has a duty to cooperate in the investigation of reports of violations. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action, including termination of employment.

If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

Retaliation will not be tolerated

No one can take any adverse action against any employee for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation of any law, this Policy, or the Company's Code of Conduct and Ethics. The Company takes reports of such retaliation seriously.

Incidents of retaliation against any employee reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting employees may also be subject to civil, criminal and administrative penalties.

Document Retention

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

Modification

The Audit Committee or the Board of Directors of The South India Paper Mills Limited (SIPM) can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with State or local regulations and / or accommodate organizational changes within the Company. The Audit Committee will review the functioning of this Vigil Mechanism/ Policy periodically.
