



## **SEVEN ISLANDS SHIPPING LIMITED**

### **WHISTLE BLOWER POLICY / VIGIL MECHANISM**

#### **Objective**

The Company is committed to complying with the foreign and domestic laws that apply to them, 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. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, both the Company and those working for or with the Company could face governmental investigation, prosecution, fines and other penalties. That can be costly. Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates:

1. Disclosure of violations or potential violations of Company policies and applicable laws before they can disrupt the operations of Company
2. Promoting a climate of accountability with respect to Company's resources, including its employees
3. Ensuring raising of legitimate concerns regarding such potential violations easily and free of any fear of retaliation

This policy is intended to be used for serious and sensitive issues such as serious concerns relating to financial reporting or unethical or illegal conduct. You are required to read this policy and acknowledge the adherence to this policy.

#### **Your 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 you report all suspected violations which shall include but not limiting to:

1. Violation of federal law or regulation, of laws or rules of the states or any jurisdiction in which Company operates
2. Violations of internal accounting controls or actions that may lead to incorrect or fraudulent financial reporting
3. Violation of the Code of Conduct and Ethics of Company or actions that otherwise amount to serious improper conduct
4. Any attempt to conceal a potential violation or evidence of a potential violations incl. bribery
5. Any retaliation for any report, complaint, allegation, or other disclosure made pursuant to this policy. Retaliation includes adverse actions, harassment or discrimination in your employment relating to your reporting of suspected violation.



This is the policy of the Company that you must, when you reasonably suspect or the time you become aware of the violation of an applicable law or the Company's Code of Conduct and Ethics has occurred or is occurring, report that potential violation immediately. You should not fear any negative consequences for reporting reasonably suspected violations because retaliation for such reporting 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. You should refrain from attempting to obtain evidence for which you do not have a right access. Such improper access may itself be considered a violation of the Code of Conduct and Ethics.

### **How to Report**

You must report all suspected violations to:

1. the Head of your Department/immediate supervisor
2. the Compliance Officer
3. anonymously, by sending an e-mail to: [cs@sevenislands.net.in](mailto:cs@sevenislands.net.in)

or by sending an anonymous letter to the Compliance Officer at:

### **The Compliance Officer**

Seven Islands Shipping Ltd.  
Suite 4, Level 8, B Wing, Times Square,  
Andheri-Kurla Road, Andheri (East),  
Mumbai – 400 059  
[cs@sevenislands.net.in](mailto:cs@sevenislands.net.in)

if you have reason to believe that your Head of Department/immediate supervisor or the Compliance Officer is involved in the suspected violation, your report may be made to the Audit Committee of the Board of Directors of the Company at:

### **The Chairperson, Audit Committee**

Seven Islands Shipping Ltd.  
Suite 4, Level 8, B Wing, Times Square,  
Andheri-Kurla Road, Andheri (East),  
Mumbai – 400 059

Because you have several means of reporting, you need never report to someone you believe may be involved in the suspected violation or from whom you would fear retaliation.



Your report should include as much information about the suspected violation as you can provide. The report shall be in English in the attached format ('Confidential Disclosure Report Form'). Where you have not reported anonymously, you may be contacted for further information. All such communications shall be clearly marked as '**CONFIDENTIAL REPORTING**'.

### **Acting in Good Faith**

Your complaint filed concerning a violation or suspected violation of the Code of Conduct and Ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicating violation of the Code of Conduct and Ethics. Good faith means that you should reasonably hold belief that the disclosure made is true and has not been made out of malice, jealousy, for personal gain or for any ulterior motive.

### **Investigations**

All reports under this policy will be recorded and thoroughly investigated. The Audit Committee may investigate and may at its discretion consider involving any other Officer of the Company and/or an outside agency for the purpose of investigation. The decision to conduct an investigation is by itself not an accusation and is to be treated as a neutral fact finding process. All information disclosed during the course of investigation will remain confidential, except as necessary to conduct investigation and take any remedial action, in accordance with applicable law. Everyone working for or with the Company has a duty to co-operate in the investigation of reports or violations. You should not discuss or disclose the investigation or your testimony with anyone not connected to the investigation. You should not discuss with the person(s) being investigated the nature of evidence requested or provided or testimony given to investigators unless agreed by investigator. Failure to co-operate 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 accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

In all instances, the Company retains the prerogative to determine when circumstances warrant an investigation (in conformity with this policy and applicable laws and regulations) and the appropriate investigative process to be employed.

### **Secrecy / Confidentiality**



You along with everyone involved in this process shall:

1. maintain confidentiality of all matters under this policy
2. discuss only to the extent or with those persons as required under this policy for completing the process of investigations
3. not keep the papers unattended anywhere at any time

### **Retaliation is not tolerated**

For you reporting any violation in good faith shall be protected from any kind of retaliation or harassment. Also, you shall not retaliate or take adverse action against anyone for 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. Incidents of such retaliation will result in appropriate disciplinary action including possible termination of employment. The objective of this policy is to encourage employees and others to raise concerns within the Company prior seeking resolution outside the Company. For those working for or with the Company who engage in such retaliation 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 with the Company under the custody of a person as authorized by the Audit Committee for a period of 5 years.

### **Review of this Policy**

The Compliance Officer shall be responsible for administration, interpretation, application and review of this policy. The Compliance Officer shall be empowered to bring about necessary changes to this policy, if required, at any stage with the concurrence of the Audit Committee.

### **Modification / Amendment**

The Audit Committee or the Board of Directors of the Company may modify this policy unilaterally at any time without assigning any reason whatsoever. Modifications may be necessary, among other reasons, to maintain compliance with federal, state or local regulations and / or accommodate organizational changes within the Company.

Please sign the acknowledgement form attached and return it to Human Resources. This will let the Company know that you have received the Whistle Blower Policy and are aware of the Company's commitment to a work environment free of retaliation for reporting violations of any Company policies or any applicable laws.



## CONFIDENTIAL DISCLOSURE REPORT FORM

### Contact Information

Name

Contact No.

Email Id.

Do you wish to be contacted by investigating officers regarding the status of the investigation? **Y / N**

### Report

1. Individual(s) suspected of violation: \_\_\_\_\_

2. Date you became aware of suspected violation: \_\_\_\_\_

3. Date of this report: \_\_\_\_\_

4. Type of violation:    1. Legal                    2. Accounting/Auditing                    3. Retaliation

5. Violation is:            1. Ongoing                    2. Completed                    3. Unclear

6. Describe the relevant facts of the suspected violation:

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7. How did you become aware of the suspected violation:

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8. Actions you took prior to this report:

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9. Who, if anyone, may be harmed or affected by the suspected violation:

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10. Any other information:

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**ACKNOWLEDGEMENT AND AGREEMENT REGARDING THE WHISTLE BLOWER POLICY**

This is to acknowledge that I have received a copy of the Company's Whistle Blower Policy. I understand that compliance with applicable laws and the Company's Code of Conduct and Ethics is important. I specifically agree that to the extent that I reasonably suspect there has been violation of applicable laws or the Company's Code of Conduct and Ethics, including any retaliation related to the reporting of such concerns, I will immediately report such conduct in accordance with the Company's Whistle Blower Policy. I further agree that I will not retaliate against any employee for reporting a reasonably suspected violation in good faith.

I understand and agree that to the extent I do not use the procedures outlined in the policy, the Company as its officers and directors shall have the right to presume and rely on the fact that I have no knowledge or concern of any such information or conduct.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name of employee

\_\_\_\_\_  
Signature