

VIGIL MECHANISM & WHISTLEBLOWER POLICY

KANAN DEVAN HILLS PLANTATIONS COMPANY PRIVATE LIMITED

PREFACE: This Whistle blower Policy (“the Policy”) has been formulated with a view to provide a mechanism for employees of the Company to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports etc.

Any employee can choose to make a protected disclosure under the whistle blower policy of the Company, providing for reporting to the Chairperson of the Audit Committee or the Board of Directors or specified authority. Such a protected disclosure shall be forwarded when there is reasonable evidence to conclude that a violation is possible or has taken place, with a covering letter, which shall bear the identity of the whistle blower.

The Company shall ensure protection to the whistle blower and any attempts to intimidate her/him would be treated very seriously.”

Section 177 (9) of the Companies Act, 2013 mandates the following classes of companies to constitute a vigil mechanism –

- Every Listed Company;
- Every other Company which accepts deposits from the public;
- Every Company which has borrowed money from Banks and public financial institutions in excess of Rs. 50 Crores.

OBJECTIVE The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. This policy aims to provide an avenue for employees to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

POLICY The Whistle blower policy intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company. The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation

DEFINITIONS

“Company” means, “Kanan Devan Hills Plantations Company Private Limited.”

“Disciplinary Action” means any action that can be taken on the completion of /during the investigation proceedings including but not limited 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.

“Employee” means every employee of the Company.

“Good Faith”: An employee shall be deemed to be communicating in “good faith” if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge on a factual basis for the communication or where the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.

“Policy or This Policy” means, “Whistle blower Policy of Kanan Devan Hills Plantations Company Private Limited.”

“Protected Disclosure” means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosures should be factual and not speculative in nature.

“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 under this Policy.

“Whistle blower” is someone who makes a Protected Disclosure under this Policy.

“Whistle Officer” or “Whistle Blower Committee” or “Whistle Committee” or “Committee” means an officer or Committee of persons who is/are nominated/ appointed to conduct detailed investigation of the disclosure received from the whistle blower and recommend disciplinary action. The Committee should include GM in charge of the HR Department, an Executive from the Internal Audit Department of the Company and a representative of the Division/ Department where the alleged malpractice has occurred.

“Chairman of the Whistle Committee” is the Head of the Industrial Relations Department of the Company.

SCOPE - Various stakeholders of the Company are eligible to make Protected Disclosures under the Policy. These stakeholders may fall into any of the following broad categories:

Employees of the Company.

Employees of other agencies deployed for the Company’s activities, whether working from any of the Company’s offices or any other location.

Contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company.

Customers of the Company.

Any other person having an association with the Company.

A person belonging to any of the above mentioned categories can avail of the channel provided by this Policy for raising an issue covered under this Policy.

The Policy covers malpractices and events which have taken place/ suspected to take place involving:

1. Abuse of authority;
2. Breach of contract;
3. Negligence causing substantial and specific danger to public health and safety;
4. Manipulation of company data/records;
5. Financial irregularities, including fraud or suspected fraud or Deficiencies in Internal Control and check or deliberate error in preparations of Financial Statements or Misrepresentation of financial reports;
6. Any unlawful act whether Criminal/ Civil;
7. Pilferation of confidential/proprietary information’
8. Deliberate violation of law/regulation;
9. Wastage/misappropriation of company funds/assets;
10. Breach of Company Policy or failure to implement or comply with any approved Company Policy;

Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

GUIDING PRINCIPLES To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

1. Ensure that the Whistle blower and/or the person processing the Protected Disclosure is not victimized for doing so
2. Treat victimization as a serious matter, including initiating disciplinary action on person/(s) indulging in victimisation
3. Ensure complete confidentiality
4. No attempt to conceal evidence of the Protected Disclosure
5. Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made
6. Provide an opportunity of being heard to the persons involved especially to the Subject.

ANONYMOUS ALLEGATION

Whistle blowers must put their names to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified. Disclosures expressed anonymously will ordinarily, NOT be investigated.

PROTECTION TO WHISTLEBLOWER

1. If one raises a concern under this Policy, she/he will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes discrimination, reprisal, harassment or vengeance in any manner. Company’s employee will not be at the risk of losing her/ his job or suffer loss in any other manner like transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle blower's right to continue to perform his/her duties/functions including making further Protected Disclosure, as a result of reporting under this Policy. The protection is available provided that:
 1. The communication/ disclosure is made in good faith
 2. She/he reasonably believes that information, and any allegations contained in it, are substantially true; and
 3. She/he is not acting for personal gain

Anyone who abuses the procedure (for example by maliciously raising a concern knowing it to be untrue) will be subject to disciplinary action, as will anyone who victimizes a colleague by raising a concern through this procedure. If considered appropriate or necessary, suitable legal actions may also be taken against such individuals. However, no action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.

2. The Company will not tolerate the harassment or victimization of anyone raising a genuine concern. As a matter of general deterrence, the Company shall publicly inform employees of the penalty imposed and disciplinary action taken against any person for misconduct arising from retaliation. 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.

Any other Employee/business associate assisting in the said investigation shall also be protected to the same extent as the Whistle blower.

ACCOUNTABILITIES – WHISTLEBLOWERS

1. Bring to early attention of the Company any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern. Delay in reporting may lead to loss of evidence and also financial loss for the Company;
2. Avoid anonymity when raising a concern;
3. Follow the procedures prescribed in this policy for making a Disclosure;
4. Co-operate with investigating authorities, maintaining full confidentiality;
5. The intent of the policy is to bring genuine and serious issues to the fore and it is not intended for petty Disclosures. Malicious allegations by employees may attract disciplinary action;
6. A whistle blower has the right to protection from retaliation. But this does not extend to immunity for involvement in the matters that are the subject of the allegations and investigation;
7. Maintain confidentiality of the subject matter of the Disclosure and the identity of the persons involved in the alleged Malpractice. If the subject is forewarned , important evidence is likely to be destroyed; and
8. In exceptional cases, where the whistle blower is not satisfied with the outcome of the investigation carried out by the Committee, she/he can make a direct appeal to the Chairman – Audit Committee of the Company.

ACCOUNTABILITIES – WHISTLE COMMITTEE

1. Conduct the enquiry in a fair, unbiased manner;
2. Ensure complete fact-finding;
3. Maintain strict confidentiality;
4. Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom;
5. Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures; and

6. Record Committee deliberations and document the final report.

RIGHTS OF A SUBJECT

1. Subjects have the right to be heard and the Whistle Committee must give adequate time and opportunity for the subject to communicate his/her say on the matter
2. Subjects have the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry/ investigation process

MANAGEMENT ACTION ON FALSE DISCLOSURES

An employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures. Further this policy may not be used as a defence by an employee against whom an adverse personnel action has been taken independent of any disclosure made by him and for legitimate reasons or cause under Company rules and policies.

PROCEDURE FOR REPORTING & DEALING WITH DISCLOSURES

1. **How should a Disclosure be made and to whom?**

A Disclosure should be made in writing. Letters can be submitted by hand-delivery, courier or by post addressed to the Chairman of the Whistle Committee appointed by the Company. Emails can be sent to the email id: whistleblower@kdhptea.co.in . Whilst, a disclosure should normally be submitted to the Whistle Officer/ Whistle Committee, it may also be submitted directly to the Chairman of the Audit Committee (via email at the email id - venkataramanan.k@tatacoffee.com), when the Whistle blower feels it necessary under the circumstances.

2. **Is there any specific format for submitting the Disclosure?**

While there is no specific format for submitting a Disclosure, the following details MUST be mentioned: (a) Name, address and contact details of the Whistle blower (including Employee Code, if the Whistle blower is an employee). (b) Brief description of the Malpractice, giving the names of those alleged to have committed or about to commit a Malpractice. Specific details such as time and place of occurrence are also important. (c) In case of letters, the disclosure should be sealed in an envelope marked “Whistle Blower” and addressed to the Chairman of the Whistle Committee OR Chairman of the Audit Committee, depending on position of the person against whom disclosure is made. Ideally the disclosure against the persons above the Senior Manager grade has to be addressed to the Chairman of the Audit Committee.

3. **What will happen after the Disclosure is submitted?**

(a) The Chairman of the Whistle Committee shall acknowledge receipt of the Disclosure as soon as practical (preferably within 07 days of receipt of a Disclosure), where the Whistle blower has provided her / his contact details.

(b) The Chairman of the Whistle Committee will proceed to determine whether the

allegations (assuming them to be true only for the purpose of this determination) made in the Disclosure refer the same to the Whistle Committee. If the Committee determines that the allegations do not constitute a Malpractice, she/he will record this finding with reasons and communicate the same to the Whistle blower.

(c) If the Chairman of the Whistle Committee determines that the allegations constitute a Malpractice, she/he will proceed to investigate the Disclosure with the assistance of the other members of the Committee, viz the Executive of the Internal Audit Department of the Company and a representative of the Division/ Department where the breach has occurred. If the alleged Malpractice is required by law to be dealt with under any other mechanism, the Whistle Officer shall refer the Disclosure to the appropriate authority under such mandated mechanism and seek a report on the findings from such authority.

(d) 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.

(e) The investigation may involve study of documents and interviews with various individuals. Any person required to provide documents, access to systems and other information by the Whistle Officer or Whistle Committee for the purpose of such investigation shall do so. Individuals with whom the Chairman of the Whistle Blower Committee or Whistle Committee requests an interview for the purposes of such investigation shall make themselves available for such interview at reasonable times and shall provide the necessary cooperation for such purpose.

(f) If the Malpractice constitutes a criminal offence, the Chairman of the Whistle Blower Committee will bring it to the notice of the Managing Director / Chairman / Audit Committee / Board of Directors and take appropriate action including reporting the matter to the police.

(g) The Managing Director of the Company may, at his/her discretion, participate in the investigations of any Disclosure.

(h) The Chairman of the Whistle Blower Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director / Chairman / Chairman of the Audit Committee / Audit Committee/ Board of Directors as soon as practically possible and in any case, not later than 45 days from the date of receipt of the Disclosure. The Managing Director / Chairman / Board of Directors may allow additional time for submission of the report based on the circumstances of the case.

(i) Whilst it may be difficult for the Whistle Officer to keep the Whistle blower regularly updated on the progress of the investigations, she/he will keep the Whistle blower informed of the result of the investigations and its recommendations subject to any obligations of confidentiality.

(j) The Chairman of the Whistle Blower Committee will ensure action on the recommendations of the Whistle Committee and keep the Whistle blower informed of the same. Though no timeframe is being specified for such action, the Company will endeavour to act as quickly as possible in cases of proved Malpractice.

4. What should I do if I face any retaliatory action or threats of retaliatory action as a result of making a Disclosure?

If you face any retaliatory action or threats of retaliatory action as a result of making a Disclosure, please inform the Whistle Officer in writing immediately. She/he will take cognizance of each and every such complaint/feedback received and investigate the same accordingly and may also recommend appropriate steps to protect you from exposure to such retaliatory action and ensure implementation of such steps for your protection.

CONTACT ADDRESS OF THE AUDIT COMMITTEE CHAIRMAN

Mr. K. Venkataramanan
Executive Director – Finance & CFO
Tata Coffee Limited
Corporate Office
No.57, Railway Parallel Road
Kumara Park West
Bangalore – 560020
E-mail - venkataramanan.k@tatacoffee.com

CONTACT DETAILS OF THE CHAIRMAN OF THE WHISTLE COMMITTEE

Mr. John Pereira
Head – IR
Industrial Relations Department
KDHP Co. (P) Ltd.
Munnar -685612
Ph : 04868-255000/999
E-mail - john.pereira@kdhptea.co.in

ACCESS TO REPORTS AND DOCUMENTS

All reports and records associated with “Disclosures” are considered confidential information and access will be restricted to the Whistle blower and the Whistle Committee. “Disclosures” and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at that time.

RETENTION OF DOCUMENTS

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of 7 years (Seven Years).

REPORTS

A quarterly status report on the total number of complaints received during the period, with summary of the findings of the Whistle Committee and the corrective actions taken will be sent to the Audit Committee of the Board of Directors of the Company.

OVER VIEW OF THE AUDIT COMMITTEE

The Audit Committee of the Board of Directors of the Company have to oversee the Vigil Mechanism and functioning of the Whistle Committee in the Company along with the periodic reports received from the Whistle Committee / Chairman of the Whistle Committee. In the event of any conflict of interest of any member of the Audit Committee in a given case, those member should recuse and the other members should evaluate the case.

COMPANY'S POWERS

The Company is entitled to amend, suspend or rescind this policy at any time. Whilst, the Company has made best efforts to define detailed procedures for implementation of this policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad intent of the policy. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this policy and further the objective of good corporate governance.

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xggejj huhfs/ twgi dahshfs/ myyJ eWtdjjprf bghUl fi s myyJ nri tfi s tH' Fk;Kfthfs;(myyJ mtwprd;C Hprhfs)

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5. nkro myyJ renj fj j wfp khd nkro myyJ mfffl LgghL kwWk; nrhji dffsYss Fi wghLfs;kwWk;ej pmwffi ffs;j ahpfFknghJ ntz Lbkdnw gpi Hahfj ahhj j y;myyJ ej pmwffi ffs;j twhd tpsffk;
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8. rll k/xG' FK i wi antz Lbkdnw kWj y;
9. epWtdjj pd;ej ybrhj J ffi s tpaak;braj y/mgfhj j y;
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5. Vwfdnt braaggl l / braa cjni rjj pUffpdw ghJ fhffggl l btsggLjj ypd; Mj hu' fi s mHfffnth myyJ ki wfffnth braj hy;xG' F el tofi f vLj j y;
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bgahpyyhj Fwrrhl L

tj jkwi y mwffi faLgthfs; Fwrrhl oy; j h' fs; bgahfi s bj hptjffntz Lk; Vbddwhy; j ftypd; \y mi lahsk; fhz ggl hj ti u gpbj hl h; nfs;tfs; kwWk; tprhui z rhj j akhdj hf , UffhJ. bgahpyyhky;btsggLjj ggLk; Fwrrhl Lfs; bghJ thf tprhui z braaggl kh l l hJ.

tj jkwy;mwffi faLgtUffhd ghJ fhgg|

1. , ej bfhsi fapdfH; xUth; xU gfhi u vGggf pwhh; vdwhy/ mth/mts; vej tj khd gHpt'h' fy; myyJ gj yyo el tofi ffsy; ghj pffggl kh l l hh;

gHpt'h' Fj y; vdgJ vt'ti faY k; braaggLfwd J dgWj j y/ gj y/ ghFghL
 nghdwtwi w cssl ffaajhFk; , ej bfhsj faPd fH; mwrfi faPl j j Pd;
 tpi sthf eWtdj j Pd; C Hpah; mtuJ / mtsJ nti y, Hggf, l khwwk/ gj tp
 Fi wggf/ gj tpgwggf/ myyJ mj rfuji j neuoahfnth myyJ ki wKfkhfnth
 gadgLj j / tj j kly; mwrfi faPl gth; j dJ chi ki a / fl i ki a braatp hky;
 j LggJ/ nkYk; ghJ fhffggf l btspggLj j i y kPz Lk; nkwbfsstpl hky;
 j LggJ cl gl vej tj khd Mgj J ffS k; , UffhJ. ghJ fhggf fH; fhq k;
 , i tfS ff tH' fggLf wJ:

1. j fty;/ btspggLj j y; eyy ekgrfi faY; braaggLf wJ
2. mts; /mth; j fty; kwWk; mj y; ml ' fpa'ss vej Fwrrhl LfsYk;
 fz rkhdcz i kcssJ vdW ekgrf wvh;
3. mts;/mth; j dggf l Mj haj j wfhf braygl tpi y

ei l Ki wi a j twhfg; gadgLj J f w vtUk; (cj huz j j wF/ j P F
 tpi stp fFk; ti faY ss xU gfi u/ mJ j twhdJ vdW bj h e j u e; J k;
 vGgggth) xG' F el tofi ffF cl gl j j ggLth/ Vbddwhy;
 , rbrayki w thap hf xU gfi u vGggf tj Pd \ yk; rfC Hpah;
 ghj j gg fF ssthh; bghUj j khdj hf myyJ ni tahdj hf fUj ggl l hyl
 mjji fa eghfS ff vj p hf bghUj j khd rll el tofi ffs;
 vLffggf yhk; , UggpDk; eddkgrfi faPd; moggi l ay; xUth; xU
 Fwrrhl i l mJ cz i k vd epahakhf ekgr vGggf gpdh;
 trhui z ay; mej Fwwk; cWj j ggLj j ggl tpi y vdwhYk/ mtUFF
 vj p hf vej el tofi fa k; vLffggf kh l l hJ.

2. xU cz i kahd gfi u vGggf f w vthkP k; J dgWj j y; myyJ gHpt'h' Fj y;
 el tofi f vLffggLti j eWtdk; bghWj J fbfhsshJ. bghJ j Lggf
 t# akhf/ gHpt'h' Fk; el tofi faPdhy; Vwgl l j twhd el j j f hf vej bthU
 egUfFk; vj p hf vLffggLk; xG' F el tofi f kwWk; tH' fggLk; j z l i d
 Mfjatw wPd; tgu' fi s eWtdk; btspgg l ahf C HpahfS ff bj h p fFk;
 , ej bfhsj faPd] fH] gffhus p fFk] xU bj h Hyhs p apd] kP Vw f dnt xG' F
 el tofi f myyJ gz p f f el tofi f el e j bfhz p UfF kh dhy] mJ
 vt'ti faY k] rhj j p khd , ej j twhd el j j kP vLffggLk] vej
 el tofi fi aakj h ffnth j h f fggf l nth bra p hJ.

Fwggf l trhui z ff c j tp braak; ntW vej gz p ahsUk; / , i z thj j fUk;
 tj j kly; mwrfi faPl gthngy; mnj mst p wF ghJ fhffggf ntz Lk;

tj j kly; mwrfi faPl gthPd; bghWggf l i k

1. mthfs; mw e j vej j twhd ei l Ki wi aak/ Mukg j j ny eWtdj j Pd;
 ftdj j wF bfhz Lrbryy ntz Lk; mthfs; Mj huj j j tH' f nji tapy y
 vdwhYk; mthfsPd; gfi hUfF nghJ khd fhuz k; , Uff ntz Lk; gfi h; brat j y;
 j hkj k; Vwgl l hy; Mj hu , Hggf kwWk; eWtdj j wF e j p , Hggf Vwgl yhk;
2. gfi u vGggf kngH bgah; Fwggf hky; , Uggi j j t p f f t k;
3. xU btspggLj j y; brat j wfhf/ , ej bfhsj faY; gh e; J i uffggf l
 ei l Ki wfi sg; gpdgwwntz Lk;

xU C Hpah; bj hpenj epahakww kwWk; j twhd ei l Ki wfs; kwWk; j twhd el j j j
gwwp xU bgahaahd Fwrrhl j l cUthffpaUej hy/ epWtd tj j pfs/ bfhsi ffs/ kwWk;
ei l Ki wfs go mj pfgl rkfh nti yaypUeJ epWj j tJ cl gl xG' F el tofi fff
cl gl j j ggl ntz Lk; nkYk; , ej bfhsi fahdJ XU C Hpauly; mthkU
vLffggll xU nkhrkhd gz pahsh; el tofi fff myyJ mtuhy; Rahj Pd khf
btspggLj j ggl l fhpa j j wF nkYk; r l l ghtkhd fhuz ' fs; myyJ epWtd
tj j Ki wfs; kwWk; bfhsi ffs; Mfpatw w wF vj p h d ghJ fhgg l aj j pahf
gadgLj j ggl hky; , Uffntz Lk;

mwpfi fa p l i y brayKi wggLj j tJ kwWk; btspggLj j yfi s i fahS tJ

1. xU btspggLj j y; vt; thWj ahhpffgg l ntz Lk; kwWk; ahi u mq fntz Lk;?

xU btspggLj j y; vGj j totiy; jahhpffgg l pUff ntz Lk; foj ' fs;
neuoahfnth/ bfhhpah; \ ykhfnth/ j ghy; \ ykhfnth epWtd j j hy; epakpffgg l
tj j k l wy; mwpfi fa p l y; FGt p d; j i y t U F F m D g g g g l n t z L k;
whistleblower@kdhptea.co.in vdw KfthpFF k p d d " ry; \ ykhftk; mDggyhk;
tj j k l wy; mwpfi fa p l y; mj p f h h p F / tj j k l wy; mwpfi fa p l y; FGt p F xU
btspggLj j i y rkhggpff p d w mnj nti say/ Fwggp l RfHej yay/ nji
tggLk h a p d / m i j j z p f i f f ; F G t p d ; j i y t U F F k ;
venkataramanan.k@tatacoffee.com vdw Kfthp p y; neuoahf rkhggpff yhk;

2. btspggLj j i y rkhggpff Fwggp l toti kgg l Vnj Dk; cssj h ?

btspggLj j i y rkhggpff Fwggp l toti kgg l x d W k ; , y y h j n g h J k l
fHfhq k; t p u ' f i s f z o g g h f F w g g p l n t z L k ; : (a) t j j k l w y ;
mwpfi fa p l g t h p d ; b g a h / K f t h p k w W k ; b j h l h g l b f h s s n t z o a t p u ' f s /
epWtd j j p d ; C H p a u h f , U F F k g l r j j p y ; C H p a h p d ; F w p a p l L v z / (b) K i w n f L
g w w p a R U f f k h d t p s f f k / K i w n f L b r a j j h f m y y J b r a a g n g h t j h f
T w g g L g t h f s p d ; b g a h f s ; M f p a t w j w f ; F w g g p l n t z L k ; e p f H t p d ; n e u k ;
k w W k ; , l k ; n g h d w t p t u ' f s k ; K f f p a k h d i t f s ; (c) b t s p g g L j j y ; f o j ' f s ;
t h a p y h f , U g g p d / m i t \ l g g l p U F F k ; x U c i w a y ; n g h l g g l l / m j d n k y ;
t j j k l w y ; m w p f i f a p l g t h ; v d v G j g g l l / b t s p g g L j j y ; v e j e p i y a y ;
c s s t U F F v j p u h f b r a a g g L f w J v d g i j g b g h W j j / t j j k l w y ; m w p f i f a p l y ;
F G j j i y t h ; m y y J j z p f i f f F G j ; j i y t h ; M f p a h U f F m D g g g g l n t z L k ;
\ j j n k y h s h ; e p i y a p y s s e g h f S f f n k y ; c s s t h f s p d ; k l j h d b t s p g g L j j y ;
v d p y / m i j j z p f i f f F G j ; j i y t U F F m D g g t j V w g l l a j h f , U F F k ;

3. btspggLj j y; rkhggpffgg l ggp d; v d d e l f f k ; ?

(a) tj j k l wy; mwpfi fa p l y; FGj j i yth; btspggLj j i y; bgwWfbfhz l j wfhd
xggj i y / tj j k l wy; mwpfi fa p l g t h ; j d J b j h l h g l t p t u ' f i s r h p a h f
b j h t j j p U F F k ; g l r j j p y / e i l K i w a y ; v t t s t [r p f f p u k ; K o a h k h m t t s t [r p f f p u k ; t H ' F t h h ; (K o e j t i u b t s p g g L j j y ; f i l f f g b g w w V G e h l f S f f s ; t H ' F t h h)

(b) tj j k l wy; mwpfi fa p l y; FGj j i yth; btspggLj j y; Twgg l Lss
Fwrrhl Lfi s (cWj pgg l od; nehffj j wfhf btspggLj j y; Twgg l Lss
Fwrrhl Lfs; cz i kahdJ vdnw fUj ggLk) rhahdj h vd cWj pggLj j
tj j k l wy; mwpfi fa p l y; FGt p w F m D g g l t h h ; t j j k l w y ; m w p f i f a p l y ; F G
F w r r r h l L g o x U K i w n f L e i l b g w t y i y b a d j h k h d j j h y / m t h ; / m t s ;

Ki wahd fhuz ' fS l d; , ej fz Lgpgi g gj rt| bra;thh; nkYk; mi j
tj jkRwy;mwpi fa| y;braj tUff mwpt gggh;

- (c) tj jkRwy; mwpi fa| y; FGjji yth; Fwrrhl Lgo xU Ki wnl
ei lbgwwbj d jhkhdj jhy/ mth;/ mts; FGtpd; gw cWggpdhfsd
eWtdj jpd; mfjj z pfi f Ji wad; eht;thf/ kRwy; ei lbgww ghrt| / Ji w
guy j e j p Mf;nahpd; cjt;pal d; bts;ggLjji y trhhgggh; rhl |gg|
Ki wfnl oy;ntbwej Ki wad;fH;rl |ggo el tofi f vLffggl ntz Lk;
vdW Twgg| oUej hy/; tj jkRwy;mwpi fa| y; mj pfhh/ mjji fa Ki wad;
fH; bghUjj khd mj pfhh;ap| k; bts;ggLjji yf; Fwggp| L/ mej mj pfhh;ap|;
fz Lgpggpdgo xU mwpi fi a bgwntz Lk;
- (d) xU rhj huz trhui z apd; Mukgj j y; Fwrrhl Lfs; gwwp bghJ thf
jftyfs; bj hpt;ffggLk/ kwWk; trhui z apd;ngH mtwwpd; css|Lfi s
tH' Ftj wfhd thaggfs; tH' fggLk;
- (e) trhui z apy; gyntW eghfS l d; nehfhz y/ Mtz ' fi s Mat;braj y;
Mf;ai t cssl' ff;TLk; tj jkRwy; mwpi fa| y; mj pfhh;ff myyJ
tj jkRwy; mwpi fa| y; FGt|ff Vnj Dk; xU egh; trhui z apd;
nehffj j wfhf Mtz ' fs; rkhggggj wF/ Vnj Dk; mi kgg|fi s
mq Ftj wF kwWk; gw jftyfi s bgWtj wF nji tgg| l hy/ mjji fa
trhui z nehffj j wfhf mt;thW braayhk; tj jkRwy; mwpi fa| y; FG
myyJ tj jkRwy; FGtpd; ji yth; mjji fa trhui z nehffj jpd; xU
nehfhz Yffhf nfi Lfbfhs;fdw eghfs/ epahakhd neu' fsy; mjji fa
nehfhz Yff j' fi s jahhgLj j pf; bfhs ntz Lk; kwWk; mjji fa
nehffj j wfhf nji tahd xj; Ji Hgi g tH' fntz Lk;
- (f) Ki wnl xU fhk;pd; Fwwkhf , Uej hy/ tj jkRwy; mwpi fa| y;
FGjji yth; mi j eht;thf , afFeh; / ji yth; / jz pfi fffG /
, afFdhfsFG Mf;atw w wF mi j vLj; rbrdW fhty; Ji wff gfh;
brat;J cl gl bghUjj khd el tofi f vLgggh;
- (g) eWtdj jpd; eht;thf , afFdh; mtuJ tUggggo vej bts;gggl od;
trhui z apYk;g' nfwfyhk;
- (h) tj jkRwy; FGtpd; ji yth; rhpahd neuj j y; , jji fa trhui z fi s
nkwbfhs;thh; nkYk; tj jkRwy;rkkej khd j' fsJ fz Lggpggfs;kwWk;
ghp;Ji ufs;Mf;atwi w vGj;J \ y mwpi fahf eht;thf , afFeh;/ji yth;/
jz pfi fffG ji yth;/jz pfi fffG / , afFeh;FG Mf;atw w wF vt;tst|
rpf;fuk;ei l Ki w rhj j pankh mt;tst|rpf;fuk;Mdh;vffhuz k;bfhz Lk/
bts;ggLj j y; fi l ffgbgww 45 ehl fS fFs;shf mDggntz Lk; eht;thf
, afFeh;/ , afFeh;/ , afFeh;/FG/ tHff;fspd;R(Hepi yfspd;moggi l ay;
mwpi f rkhggpff TLj y;neuj i j mDkj pffyhk;
- (i) trhui z apd; Kdndwvj i j ggwwp tj jkRwy; mwpi fa|LgtUff bj hl he;J
bj hpt;ggJ tj jkRwy; mwpi fa| y; mj pfhh;ff rpkkhf , Uffyhk; Mdh;
mth;/ mts; , ufr;aj j di kapd; fl LgghLfs ff cl gl L trhui z apd;
Kot|fs;kwWk;ghp;Ji ufs;gwwp tj jkRwy;mwpi fa|LgtUff bj hpt;gggh;

(j) tj jkLwy; mwrfi faPl y; FGjji yth; tj jkLwy; FGtPd; ghp;Ji uapd; kPJ
el tofi ffi s cWj pbraJ mej jfti y tj jkLwy; mwrfi faPlgtUFF
bj htpgggh; , jji fa el tofi ffS fF Fwggpl l fhy mst[xdwk;
Fwggpl ggl tpyi y vdwhYk/ ep+gpfggpl l Ki wnfL kPJ epWtdk;vt;tst[
tpi uthf Koahkh mt;tst[tpi uthf braygl KawrpfFk;

4. ehd;xU btspggLjji y brajjpd;tpi sthf VwgLk;gHpth' Fk;el tofi ffs/
gHpth' Fk; el tofi ffs; gwwpa mrRWjjyfs; Mfpatwi w vj hbfhz l hy;
vdd braa ntz Lk;?

xU btspggLjji y brajjpd;tpi sthf VjhtJ gHpth' Fk; el tofi ffs/
gHpth' Fk; el tofi ffs; gwwpa mrRWjjyfs; Mfpatwi w eP fs; rej j jhy/
cl doahf tj jkLwy; mwrfi faPl y; ji ytUFF mi j vGj J \yk; mwptpff
ntz Lk; mth; / mts; xtbthU glfhi uak/ fUj J ffi sak;
bgwWfbfhs;tnj hL mj wfhd t rhuiz i aak; nkwbfs;thh; mjji fa
gHpth' Fk; el tofi ffs;ypUeJ c' fi sg; ghJ fhggj wFk/ c' fs;
ghJ fhggj wfhd tHpi Ki wfi s cWj pbra;tj wFk; mth; rhpahd el tofi ffi s
vLgghh;

jz pfi ffFGji ythpd;bj hl hg[Kfthp

j pU.fpb't' fl l ukz d;
bray;; afFdh;- eij p&j i yi k eij p mj p fhhp
l hl h fhgpykpl l ;
fhhggnul ;Mgp ;
ekgh;57/ , uapynt , i z rhi y
Fkhuh ghhf;bt! l ;
bg' fS h;- 560020
kpdd" ry;- venkataramanan.k@tatacoffee.com

tj jkLwy;mwrfi faPl y;ji ythpd;bj hl hg[Kfthp

j pU.\$hd;bgj uuh
ji yth;- l.Mh;
bj hHpy;cwtlfs;Ji w
nf.o.vr;gp fkbgdpgi untl ;ykpl l ;
\ z hh;- 685 612
bj hi yngrp vz ;04868-255000/999
kpdd" ry;- john.pereira@kdhptea.co.in

mwrfi ffs;kwWk;Mtz ' fi s mq Fj y;

“btspggLj j yfs;” bj hl hghd mi dj J mwrfi ffS k/ gj ptl fS k; , ufrpaj j ftyhff;
fUj ggLfPdwd/ nkYk; tj jkLwy; mwrfi faPl y; FG kwWk; tj jkLwy; mwrfi faPlgth;
Mfnahh;mq fy;tukgpwFs;tUth; “btspggHfs;” kwWk;t rhuiz apd;tpi stlfs/
mwrfi ffs; kwWk; brayghLfsPd;tpi stlfs; Mfpatwi w/ rll nji tfs; myyJ
tj pKi wfs/ myyJ mej rrkaj j py; ei l Ki waypUffpdw bgUepWtd bfhsj ffs;
MfpatwPd;nj i tfs;j t p/ bghJ thf bghJ kffS fF bj hraggLj J tj pyi y.

Mtz ' fi s i tjjUjy;

rkgej ggl l trhui z apd; KotfS l d; vGj ggl l myyJ Mtz ggLjj ggl l vyyh
ghJ fhffgg l l btsrgg Ljj yfS k; eWtdjj hy; Fi wej gl rk; 7 Mz Lfs; i tffgg l
ntz Lk;

mwrfi ffs;

Fwgg l l fhyffl l j j y; bgwgg l l bkhj j gfhfhi sg; gwwpa fhyhz L epi y mwrfi f
tj j k l wy; mwrfi fa l y; FG tpd; fz Lgpgggpd; RUffk; kwWk; vLffgg l l j j j
el tofi ffs; tigu' fs; Mfai t , afFehfs; FG tpd; j z rfi f FG t p w F
mDggggLk;

j z rfi f FG tpd; fz nz hl l k;

eWtdjj pd; , afFehfs; thhpajj pd; j z rfi f FG thdJ/ tj j k l wy; mwrfi fa l y;
FG tpd; ji yth; / tj j k l wy; mwrfi fa l y; FG Mfai t w w l k l Ue; j bgwgg l l fhy
mstiyhd mwrfi fa l d; eWtdjj pd; tj j k l wy; mwrfi fa l y; FG tpd; braygh l l
nkwhghj ta l ntz Lk; Fwgg l l tHffiy; j z rfi fFG t p Y ss xU cWggpdUff
fUj; JntWghL css rej hggj j y/ mej m' fj j pdi u mej tHffiy Ue; j t l t j j k w w
cWggpdhfs; , ej tHfi f k j gg l L braa ntz Lk;

eWtdjj pd; mj rfhuk;

, ej bfhsi fi a vej neuj j pY k; j j j j / j wfhypfkhf eWj j pi tff myyJ uj; j braa
eWtdjj p w F chpi k cssJ. , ej bfhsi fi a ei l Ki wggLj; j tj wfhd t h p t h d
brayki wfi s ti waWff eWtdk; rpej Kawrfi s nkwbhzh pUffpdw
mnjnti say; ny rej hgg' fs; ny t r t fhu' fs; bj h p t p f f g g l hky; myyJ
ei l Ki wfs; bj s p t pdi ka s s j hf , Uffyhk; , j j i fa r p k' fs; myyJ
bj s p t pdi k Mfai t bfhsi fa pd; guej nehffj j p w n f w g j h f f g g l ntz Lk; eWtdk;
, ej bfhsi fa pd; nehffk; kwWk; eyy bgUe; j t d MS i k nehffj j j epi wntw
nkYk; gy tj j ki wfi sa k/ ei l Ki wfi sa k; mt; t g n g h J eWtyhk;
