

## **Whistle Blower Policy**

### **1. Introduction**

In the present age the essence of 'whistle blowing' has been amply demonstrated and realized on a global spectrum in all forms of governance. The inclusion of a forum where employees can approach the redressing platform with confidence and assurance is an intrinsic part of today's era of good corporate governance, transparency and accountability. TAM Media Research Pvt. Ltd believes in these values and to that end recognizes the need for a communication system in the organization to allow a remedial body consisting of Members of the Senior Management to have information about any impropriety, abuse of power, malpractice, frauds, harassment, past / present or continuing instances of bribery, corruption, and any other untoward event within the organization. TAM has therefore formulated and adopted a 'Whistle Blower Policy' whereby the employees can address their concerns without any fear to a Committee which will be known as the 'Whistle Blowing Committee'.

### **2. Objective and Rationale of the Policy**

In pursuance of the nature of services rendered and the functional operations of the Company and in consonance with the type and nature of tasks performed by its employees, the Company recognizes that strict confidentiality and unimpeachable ethical conduct are the core essential requirements desired from its employees. To achieve priority adherence to these most primary requirements the Company lays explicit stress on maintaining confidentiality of Company operations and functions by each employee and uncompromising adherence to the code of non-parting of information either deliberately or inadvertently to any person and even to a colleague employee not concerned with a particular function. This prominent requirement is one of the chief objectives of this policy.

It is a fact that employees of the organization are more or less the first to know of any wrongdoings within the organization such as breach of confidentiality regarding panel homes, past / present or continuing instances of bribery and corruption, fraud, malpractice, harassment and any other illegalities or misconduct. Due to fear of reprisal, misplaced feeling of disloyalty to a colleague or other unspecified considerations, employees, in most of the cases, are reluctant to report the same to authorities either within their department/function or to the management of the organization.

This policy is framed with a view to encourage the employees to voice their bona fide suspicions, concerns, information or confirmed knowledge regarding untoward events/activities without any fear of reprisal or harassment in any form. The primary objective of this policy is to identify any breach of security / confidentiality of information regarding panel homes by employees or outside entities, manipulation of data, unethical or criminal malpractice, or an untoward happening with the assistance of the employees and to take pre-emptive, corrective or punitive measures against such occurrence. This would encourage the employees to raise any doubts to the management of the Company rather than overlooking it. This would also help in nurturing and strengthening the belief that wrongdoing and wrongdoers are neither tolerated nor condoned leading to an increased sense of belonging to the organization and in the process helping the Company in the long run.

### **3. Applicability**

This policy is applicable to all the employees of the Company, including the permanent employees and employees on probation. The policy shall be applicable with immediate effect.

#### 4. Method of registering complaints / information

The company has formed a Committee which will be known as the 'Whistle Blowing Committee' (hereinafter called the Committee) and it is to this committee that employees may communicate their information, complaints, concerns or bona fide suspicions.

The names of the Members of the Committee and their contact numbers are as follows –

1. Ravi Ratanjankar, COO, Head of Vigilance, Investigation & Corporate Risk Mitigation: + 9821 323073
2. Prasad Walawalkar – Senior Vice President - HR : + 9820 451965

The information / complaint can be addressed to all or any of the above members and should be sent to the below mentioned address.

TAM Media Research Pvt. Limited  
 Peninsula Business Park,  
 Unit 203, 2nd Floor, Tower A,  
 Senapati Bapat Marg, Lower Parel (West),  
 Mumbai - 400 013

The email ID to which the employees may send their information or complaints is as follows –

[complaints@tamindia.com](mailto:complaints@tamindia.com)

The 'acts' which are intended to be covered by this policy are listed below, however, the list is only indicative of the 'acts' covered by this policy and there can be other instances as well which may fall within the scope of this policy.

1. Any act which violates any of the policies of the Company.
2. Any act or misdemeanour liable for action under the Civil or Penal Code of India.
3. Any act compromising the confidentiality of panel homes by employees
4. Any act by outside entities to breach the security of panel homes or influence any other data of any kind in any manner.
5. Any act by employees to manipulate data in any manner to benefit outside entities either for pecuniary benefit or any other reason.
6. Any act by either employees or outside entities to hack or pilfer any kind of data belonging to the Company in any manner.
7. Any acts, past / present or continuing instances of bribery, kickbacks, fraud, corruption, or pecuniary benefit in any form from outside entities or from within the organisation.
8. Accumulation of wealth / property from past or continuous acts of corruption.
9. Acts of malpractice and breach of trust.
10. Any act divulging any of the Company's confidential information restricted for the knowledge and use of a particular employee or a particular department performing a certain function, to another employee unrelated to the function or to an outside person or entity either advertently or inadvertently.

11. Any act or acts of instigation, encouragement or intimidation, either directly or indirectly, causing to hinder or stop in any manner an employee from performing his duties or the functioning of a department(s) or the organisation as a whole.
12. Acts tantamount to abuse/misuse of power, including harassment.
13. Acts which may be hazardous or may cause a safety risk.
14. Any act of viewing of pornographic or content of similar nature within or out of office premises on any electronic and digital device issued by the Company to the employee.
15. Failure by an employee to perform his ordained duties pursuant to any legal or statutory obligation cast upon him in his capacity as an employee of the Company.
16. Any act not specified in this list but, in the opinion of the Committee, warranting requisite action.

The complainant, together with the intimation about the said act / adverse activities, may furnish all the documents and information which will substantiate his suspicion. An employee who makes a complaint or submits information will not be expected to prove the truth of his allegations or suspicions as long as he is raising the concern in good faith and in the bona fide interest of the Company but the employee should be able to make out sufficient grounds for the belief that a wrong had been intended or committed.

The employee shall disclose his/her name in the communication sent to the Committee and it is assured under this policy that such information will remain absolutely confidential. If the employee has chosen to maintain anonymity about his/her identity and the Investigating Authority cannot obtain clarification or additional details essential for investigation of the information then the Investigating Authority shall have the discretion of either investigating the matter or recommending the same for closure depending upon the adequacy and merit of the details mentioned in the information and the credibility of the issues raised.

The employees may send their information, complaints or raise their concerns either in a personal meeting with any of the Committee Members, or by email, letter or fax. Information conveyed by telephonic means will be heard but the same will be investigated depending upon factors such as the identity revealed by the informant, nature of the details revealed in the information and the credibility of the information. However it is recommended that information should be mainly sent by any of the above said 4 methods.

Complaints pertaining to breach of confidentiality of panel homes, manipulation of any data, bribery, corruption, kickbacks, malpractices, fraud, financial irregularities, data hacking / pilferage, divulging of confidential information, misuse of power, various tactics to stop work, criminal misconduct will be investigated by the Vigilance Department. Complaints pertaining to harassment/victimization which may include involuntary demotion/resignation/retirement, disciplinary action, termination of employment, rejection of confirmation will be either investigated by the HR Department or the Vigilance Department as deemed fit depending upon the matter in consideration. The investigating authority will submit its report to the Committee and the decision of the Committee in this regard shall be final and binding on all the concerned.

It is assured that the whistle blowing employee raising a genuine and credible issue which does not implicate him either directly or indirectly in any manner will be protected and it will be ensured by the Committee that he will not be subject to any form of retribution, reprisal or harassment from any quarter. If the employee requests for protection/anonymity, the Committee shall not disclose his identity without his/her consent. However, if the complaint is investigated to reveal that the acts perpetrated invoke the Indian Penal Code and subject to investigation by Law Enforcement Agencies requiring the disclosure of the identity of the complaining employee then the Committee shall have the right to disclose the same.

Where the employee has disclosed information regarding wrongdoings in good faith but the same could not be proved during subsequent investigation, the employee would not be liable for any action. However, it is desired that the information should be reasonably factual and not speculative and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the complaint.

During the course of investigation the complainant / informant employee, the investigating officers, the members of the Committee and all the persons who are interviewed or with whom the matter is discussed shall maintain strict confidentiality regarding the details of such information received/obtained during the investigation, interviews or discussions. No person as aforesaid mentioned shall make any such information public without prior written permission of the Committee. The provisions of this clause shall survive the employment and/or any other relationship/association of the employees/persons with the Company. However, the provisions of this clause shall not be applicable where the information is required to be disclosed to a law enforcement agency or in any judicial process in accordance with the applicable laws of India. During the course of investigation the person(s) against whom the complaint is being investigated will not interfere with the investigation, withhold, tamper, destroy evidence or influence, coach, threaten or intimidate witnesses in any manner. Evidence of such interference, either oral or documentary will be dealt with summary action as deemed fit by the Committee.

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. Such amendment or modification will be notified to the employees subsequent to which the amended / modified policy will be binding on all employees.

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