

**PIRAMAL FOUNDATION, USA
WHISTLEBLOWER POLICY**

I. Expectation

Piramal Foundation, USA (the “Corporation”) expects directors, officers, employees and volunteers to observe high ethical standards in carrying out their responsibilities and to comply with all applicable laws and regulations.

This Policy aims to provide a channel to all employees, directors, officer or Volunteer to report genuine concerns about unethical behavior, actual or suspected fraud or violation of the Organization’s Code of Conduct & Ethics. However, this does not release the employees from their duty of confidentiality in their course of work nor can it be used as a route for any Malicious Complaints.

II. Open Door Policy

If any director, officer, employee, or volunteer has complaints, concerns, or questions as to the ethics or legality of a particular action taken by a director, officer, employee, or volunteer, such person is encouraged to raise such complaints, concerns or questions with the relevant individual, including the president, another officer or director, the executive director, or another employee. In the event a director, officer, employee, or volunteer believes that there may have been a legal transgression and that it is not reasonable to raise the issue with an officer, director, or employee, such person should contact an outside attorney or authority. Anyone filing a complaint concerning a violation or suspected violation of a law, regulation or ethical requirement must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Individuals making baseless or malicious accusations will be disciplined up to and including removal or termination.

The Protected Disclosures may also be submitted by email to pf.usa@piramalfoundation.org.

III. Coverage of Policy

The policy covers all malpractices and all unethical, illegal or improper activities which have taken place / suspected to have taken place, including but not limited to the following:

1. Abuse of authority
2. Negligence causing substantial and specific danger to public health and safety
3. Financial irregularities including fraud or suspected fraud
4. Criminal offence
5. Pilferation of confidential / proprietary information
6. Misappropriation of Organization funds / property
7. Breach of Code of Conduct & Ethics Policy
8. Sexual Harassment*
9. Any other unethical or immoral or illegal events

*For complaints relating to sexual harassment, employees may use either this Policy or the Sexual Harassment Policy of the Organization or both.

IV. Requirement of Investigation

Within a reasonable time of receiving a complaint, concern or question regarding compliance with a law, regulation or ethics requirement, the executive director and/or a director or officer shall open an investigation into the matter and pursue it to resolution. Should the executive director, director or officer find that a law, regulation or ethics requirement has been violated, appropriate action should be taken.

V. Confidentiality

To the degree possible, the names of the individuals reporting under this Whistleblower Policy shall be kept confidential.

VI. Protection from Retaliatory Action

Neither the Corporation nor its managers may take any negative employment or other retaliatory action against any director, officer, employee, or volunteer who in good faith reports a violation of a law or regulatory requirement. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline including, but not limited to, termination of employment.

VII. General Policy

This general policy is not a contract and it may be rescinded or amended at any time by the Corporation. It is not intended to and does not create any legally enforceable rights whatsoever for any employee.