

TMILL GROUP OF COMPANIES

TM International Logistics Limited

TKM Global Logistics Limited

International Shipping and Logistics FZE

TKM Global GmbH

TKM Global China Limited

Policy Title	Whistle Blower Policy for Vendors		
Policy Custodian	Chief Ethics Counsellor	Approved By	Managing Director
Policy Basis	Tata Steel	Stakeholders	All Personnel (TMILL Group)
Policy Version	004	Effective Date	02.12.2024

WHISTLE BLOWER POLICY FOR VENDORS



WHISTLE BLOWER POLICY FOR VENDORS

In compliance with Clause 25 of Tata Code of Conduct and in furtherance with TMILL's Group policy to encourage and protect genuine Whistleblowing by Vendors, a Vendors' Whistleblowing Protection Policy ("Policy") has been developed.

Definitions:

"Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith and which discloses information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature, by any Employee, Director or vendor.

"Vendor Whistle blower" means a person/organization registered in the Vendor data base of the Company, making a Protected Disclosure and thereafter extending whatever assistance may be required in establishing facts mentioned in the Protected Disclosure.

Procedure:

- Protected Disclosures should preferably be reported in writing i.e. in ink or electronically and should be factual (not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower.
- Misconduct concerning Managing Director/Chief Financial Officer/Vice-President/Chief Ethics Counsellor and employees at Senior level, should be addressed to the Chairman of the Audit Committee of TMILL and those concerning other employees, should be addressed to the Chief Ethics Counsellor.
- The Whistle blower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistle blowers.
- The contact details of the Chairman of TMILL Audit Committee and of the Chief Ethics Counsellor are as under:

Chairman of TMILL Audit Committee:

Mr. Virendra Sinha

Registered Office: Tata Centre 43, 14th Floor, 43, J. L. Nehru Road, Kolkata – 700071.

Corporate Office: 7th Floor, Infinity IT Lagoon, Plot - E2-2/1, Block - EP & GP, Sector - V, Salt Lake, Kolkata – 700091.

Email: sinha.viren@gmail.com



Ethics Counsellor:

Ms. Jyoti Purohit

Registered Office: Tata Centre 43, 14th Floor, 43, J. L. Nehru Road, Kolkata – 700071.

Corporate Office: 7th Floor, Infinity IT Lagoon, Plot - E2-2/1, Block - EP & GP, Sector - V, Salt Lake, Kolkata – 700091.

Email: jpurohit@tmilltd.com

Protection to the Vendor Whistle blower:

- The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Vendor Whistle blowers while conducting business with the Company.
- The Vendor Whistle blower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/orders, refusal from issuance of 'RFQ (Request For Quotation)' to them, or any direct or indirect use of authority to obstruct the Vendor Whistle blower from continuing to execute their jobs, including making further Protected Disclosures.
- Should, in spite of best efforts by TMILL Group Companies, the identity of the Vendor Whistle blower become known during the investigation, the Head of Department/Chief Ethics Counsellor, shall ensure that the Vendor Whistle blower, is provided with all the assistance required to execute existing orders.
- Under no circumstances, subjects against whom the disclosures have been made should compel investigator to disclose the identity of the Vendor Whistle blower.

Disqualifications:

Any abuse of this protection by vendors will warrant disciplinary action.

Vendor Whistle Blower Protection Committee:

TMILL Group has constituted the Vendor Whistle Blower Protection Committee ("the Committee"). In case a Vendor Whistle blower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the Ethics Counsellor, giving specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Committee for their examination. The Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

Mr. Dinesh Shastri, Managing Director - Chairman

Mr. D.K. Nanda, Chief- CHA&IL and CCM

Mr. Jyoti Purohit, TMILL - Company Secretary/Ethics Counsellor - Convener



Amendment:

TMILL Group reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Notification to this Policy:

Purchase Department (HOD) shall ensure that an approved copy of this Policy and its subsequent amendments if any, are notified in writing/ via email, to all the vendors engaged by the Company.



Dinesh Shastri
Managing Director

Date: 02.12.2024