

 CROWNTECH	CROWNTech SURFACE FINISHINGS PVT. LTD. WHISTLEBLOWER POLICY	DOC: CT/HR/P/09
		Rev : 00
		Date No: 01.01.2026

WHISTLEBLOWER POLICY

1. Purpose

The purpose of this Whistleblower Policy is to provide a safe and confidential mechanism for employees and other stakeholders to report suspected fraud, corruption, unethical conduct, legal violations, financial misconduct, safety violations, harassment, or other serious wrongdoing within the organization.

The Company is committed to investigating genuine concerns fairly and protecting individuals who report concerns in good faith from retaliation.

2. Scope

This policy applies to:

- Permanent and temporary employees
- Contract workers and consultants
- Directors and senior management
- Apprentices and trainees
- Suppliers, contractors, and service providers
- Other persons who have a legitimate business relationship with the Company

3. Matters That May Be Reported

A whistleblower may report concerns including, but not limited to:

- Fraud, theft, or financial irregularities
- Bribery and corruption
- Misuse or unauthorized use of Company property
- Falsification of records or documents
- Conflict of interest
- Violation of laws or regulatory requirements
- Serious violations of Company policies
- Health and safety violations
- Environmental violations
- Harassment, discrimination, or other serious workplace misconduct
- Unauthorized disclosure or misuse of confidential information
- Retaliation against a person who has raised a genuine concern

Routine employment grievances, such as individual salary disputes or leave matters, should normally be handled through the appropriate HR grievance procedure unless they involve serious misconduct or legal violations.

 CROWNTECH	CROWNTECH SURFACE FINISHINGS PVT. LTD. WHISTLEBLOWER POLICY	DOC: CT/HR/P/09
		Rev : 00
		Date No: 01.01.2026

4. Who Can Make a Report

Any person covered by this policy may raise a concern when they have a reasonable basis to believe that misconduct has occurred, is occurring, or may occur.

Reports should be made in good faith and should contain as much factual information as reasonably available.

5. Reporting Channels

Concerns may be reported through any of the following channels:

Whistleblower Email: hr@crowntech.in

Whistleblower Hotline: 9840856764

Compliance Officer: V. Venkat- HR- 9445293756

6. Information to Include in a Report

Where possible, the report should include:

- Nature of the concern
- Date and location of the incident
- Names/designations of persons involved
- Description of what happened
- Relevant documents or evidence
- Names of potential witnesses
- Any other information that may assist the investigation

Anonymous reporting may be permitted where the Company's reporting mechanism allows it.

7. Confidentiality

The Company will handle whistleblower reports with appropriate confidentiality.

Information about the whistleblower, allegations, witnesses, and investigation will be disclosed only to persons who have a legitimate need to know, subject to applicable law and the requirements of a fair investigation.

Confidentiality cannot be guaranteed where disclosure is legally required.

	CROWNTECH SURFACE FINISHINGS PVT. LTD. WHISTLEBLOWER POLICY	DOC: CT/HR/P/09
		Rev : 00
		Date No: 01.01.2026

8. Protection Against Retaliation

The Company prohibits retaliation against any person who, in good faith:

- Reports a concern;
- Participates in an investigation;
- Provides information or evidence; or
- Assists with an investigation.

Retaliation may include dismissal, demotion, threats, harassment, discrimination, intimidation, unfavorable treatment, or other adverse action because of the report.

Any suspected retaliation should be reported immediately through the whistleblower reporting channels.

9. Investigation Procedure

Upon receiving a report, the designated authority will:

30. Acknowledge receipt where the identity of the reporter is known.
31. Conduct an initial assessment of the concern.
32. Determine whether a formal investigation is required.
33. Appoint an appropriate and impartial investigator.
34. Collect relevant documents and evidence.
35. Interview relevant individuals where necessary.
36. Maintain appropriate investigation records.
37. Prepare findings and recommendations.
38. Take appropriate corrective or disciplinary action where warranted.

The investigator should be independent of the matter being investigated and should disclose any potential conflict of interest.

10. Fair Treatment

A person who is the subject of an allegation will be treated fairly and will have an opportunity to respond to relevant allegations in accordance with Company procedures and applicable law.

A whistleblower's report will not automatically be treated as proof of wrongdoing. Findings should be based on available evidence.

11. Malicious or Deliberately False Reports

The Company recognizes that reports may occasionally be made in bad faith.

	CROWNTech SURFACE FINISHINGS PVT. LTD. WHISTLEBLOWER POLICY	DOC: CT/HR/P/09
		Rev : 00
		Date No: 01.01.2026

A person who deliberately makes a knowingly false or malicious allegation may be subject to appropriate disciplinary action.

However, a report that is made in good faith will not be treated as misconduct merely because the investigation does not substantiate the allegation.

12. Corrective Action

Where an investigation establishes misconduct, the Company may take appropriate action, including:

- o Disciplinary action
- o Recovery of losses
- o Corrective or preventive measures
- o Changes to internal controls or procedures
- o Training or additional supervision
- o Reporting to relevant authorities where legally required

13. Records and Monitoring

The Company will maintain appropriate records of whistleblower reports and investigations in accordance with applicable legal, regulatory, privacy, and record-retention requirements.

The Company may periodically review whistleblower cases to identify recurring risks and improve internal controls.

14. Responsibilities

Employees: Report genuine concerns promptly and cooperate with investigations.

Managers: Take concerns seriously and promptly refer matters covered by this policy to the designated authority.

Whistleblower/Compliance Officer: Receive and assess reports, maintain confidentiality, coordinate investigations, and monitor protection against retaliation.

Senior Management/Board/Audit Committee: Provide oversight and ensure appropriate action is taken.

Signature

 CROWNTECH	CROWNTECH SURFACE FINISHINGS PVT. LTD. WHISTLEBLOWER POLICY	DOC: CT/HR/P/09
		Rev : 00
		Date No: 01.01.2026

Whistleblower Reporting Form

Date: _____

Name of Reporter: _____
(Optional if anonymous reporting is permitted)

Department/Organization: _____

Contact Details: _____

Nature of Concern:

Date/Location of Incident:

Persons Involved:

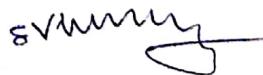
Details of the Concern / Evidence:

Witnesses (if any):

Declaration:

I confirm that the information provided above is, to the best of my knowledge, provided in good faith.

Signature : _____ Date: _____



DIRECTOR