Whistleblower Policy

Purpose of this policy:

The purpose of this policy is to articulate the Company's point of view on whistle blowing, the process, and the procedure to strengthen whistle blowing mechanism at the Company.

This policy:

Provides a platform and mechanism for the employees and directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.

It provides an environment that promotes responsible and protected whistle blowing. It enables Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Organization Values or the Organization Code of Conduct.

The policy is equally applicable to Third parties who may wish to report a concern related to Organization Values or Organization Code of Conduct.

Coverage of this policy:

This policy is applicable to all the business verticals, including all employees and Directors.

Who is a whistle blower?

Any Employee or Director who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the organization`s Code of Conduct or Values. This Whistleblower has come to the decision to make a disclosure or express a genuine concern /grievance/allegations, after a lot of thought.

Protection:

The process is designed to offer protection to the Whistleblower (employees and directors) provided that the disclosure made / concern raised / allegations made ("complaint") by a Whistleblower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Organization Values and/or Organization Code of Conduct.

The Company affirms that it will not allow any Whistleblower to be victimized for making any complaint. Any kind of victimization of the Whistleblower brought to the notice of the Appropriate Committee will be treated as an act warranting disciplinary action.

Reporting in good faith

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumour. This also means that no action should be taken against the Whistleblower if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be frivolous, malicious, or made with ulterior intent/motive, the Appropriate Committee should take appropriate disciplinary or legal action against the concerned Whistleblower.

List of exclusions

The following types of complaints will ordinarily not be considered and taken up:

1. Complaints that are Illegible, if handwritten
2. 2. Complaints that are Trivial or frivolous in nature
3. 3. Matters which are pending before a court of Law, State, National Human Rights
4. Commission, Tribunal or any other judiciary or sub judiciary body
5. 4. Any matter that is very old from the date on which the act constituting violation, is
6. alleged to have been committed
7. 5. Issue raised, relates to service matters or personal grievance (such as increment,
8. promotion, appraisal etc) also any customer/product related grievance.

Dealing with anonymity

A Whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

Confidentiality

The Appropriate Committee will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the Whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the Whistleblower.

Procedure for raising a complaint

- To report any concerns on ethics, any observed illegal or unethical practices, please write to ethic@sportzvillage.com
- The Whistleblower shall receive a report within one month of the initial report, regarding the investigation, disposition or resolution of the issue.
- If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal agency.
- The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement.