

## **QUINTEGRA SOLUTIONS LIMITED - Whistle Blower Policy**

### **Background**

Pursuant to amended Clause 49 relating to Corporate Governance under the Listing Agreement, the Board of Directors of Quintegra Solutions Limited have framed the 'Whistle Blower Policy' to report to the management about unethical behaviour, actual or suspected fraud or violation of Company's Code of Conduct or Ethics Policy. Quintegra strongly believes that "The good of the people is the Chief Law."

### **General**

The Quintegra Solutions Limited Code of Conduct requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Quintegra, honesty and integrity must be practiced in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers and employees of Quintegra to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

### **Responsibility of the Whistle Blower**

The Whistle Blower shall use good judgment and factual information in reporting suspected acts of wrongdoing in order to avoid unnecessary and damaging allegations. Should the Whistle Blower wish to remain anonymous, the onus is on the whistle blower to take necessary precautions, and to clearly state this intention to the reporting authority. Anonymous mails will not be entertained.

### **No Retaliation**

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistle Blower Policy is intended to encourage and enable employees to report the unethical behaviour free from fear or intimidation.

### **Reporting Violations**

This Code addresses Company's open door policy and suggests that employees share their concerns, or complaints with someone who can address them properly. Accordingly in conjunction with the Company's Code of Conduct, the employees shall approach the HR Head or COO to address the area of concern. For suspected fraud or securities law violations he may contact the Compliance Officer directly.

### **Compliance Officer**

Quintegra's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and shall advise the senior management and/or the Audit Committee accordingly. He has direct access to the Audit Committee of the Board of Directors and is required to report to the Committee at least annually on his compliance activity. Please mail us at [investors@quintegrasolutions.com](mailto:investors@quintegrasolutions.com). In case of urgent necessity the whistle blower may also directly contact the Chairman of the Audit Committee, Mr R Krishnan whose telephone number is 044-24342321. Should the Audit Committee/Board deem it necessary, outside legal counsel will be consulted.

### **Accounting and Auditing Matters**

The Audit Committee of the Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall notify the Audit Committee of any such complaint within a week from the date of receipt of complaint and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt (as applicable) of the reported violation or suspected violation within 4 working days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.