

# **Corporate Governance**

## **Whistleblower Policy RAK Ceramics India Pvt. Ltd.**

**Revised on 21<sup>st</sup> January 2025**

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Corporate Governance – “**Whistleblower Policy**” RAK Ceramics India Pvt. Ltd.

### 1. Background

This Policy addresses the commitment of RAK Ceramics India Pvt. Ltd. (the "Company/integrity and ethical behaviour by helping to foster and maintain an environment where employees can act appropriately, without fear of retaliation. To maintain these standards, RAK India encourages its employees who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company, to come forward and express these concerns without fear of punishment or unfair treatment.

RAK India conducts business based on the principles of fairness, honesty, openness, decency, integrity and respect the Company's policy to support and encourage its employees to report and disclose Improper or illegal activities, and to fully investigate such reports and disclosures. It is also the Company's policy to address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees who report, disclose or investigate Improper or illegal activities (the "Whistleblowers") and to protect those who come forward to report such activities. The Company assures that all reports will be treated strictly confidentially and promptly investigated and that reports can be made anonymously, if desired.

### 2. Objectives of the Policy

The intended objectives of this policy are:

- ✓To provide avenues for Directors and employees to raise concerns and define a way to handle these concerns.
- ✓To enable Management and or the Board to be informed at an early stage about acts of misconduct.
- ✓To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure.
- ✓To help develop a culture of openness, accountability and integrity.

### 3. Scope of the policy

This Whistleblowing policy governs the reporting and Investigation of Complaints as well as protections for the Whistleblower. The complaints/concerns could be regarding, inter alia:

- ✓Fraud and bribery.
- ✓Theft and misappropriation.
- ✓Unlawful activity.
- ✓Activities that are not in line with Company policy, Including the Code of Business Conduct; or
- ✓ Activities, which otherwise amount to serious improper conduct.

#### 4. Safeguards

Harassment or Victimization- Harassment or victimization for reporting concerns under this policy will not be tolerated. No employee who makes a report or raises genuinely held concerns will be dismissed or subject to any detriment or victimization. If employees believe that they are being victimized within the workplace as a result of having made the report or raised the concern, they should inform the Chairman of the Audit Committee Immediately.

RAC Ceramics is committed to investigating any such reports or disclosures fully, fairly, quickly and confidentially where circumstances permit. So far as the Chairman of the Audit Committee considers it appropriate and practicable, the employee who made the report will be kept informed of the progress of the Investigation.

Confidentiality Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and Investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- ✓The seriousness of the issue raised,
- ✓The credibility of the concern; and
- ✓The likelihood of confirming the allegation from credible sources

Bad Faith Allegations-Allegations in bad faith may result in disciplinary action.

#### 5. Reporting and Handling of Whistle-blower Complaints

Reporting- The whistleblowing procedure is intended to be used for serious and sensitive Issues. Such concerns, Including those relating to financial reporting, unethical or illegal conduct, may be reported. The following mechanisms shall be put in place to facilitate reporting of whistleblower complaints;

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i. RAK India Whistleblowing Officer whose contact details are given below

Raman Garg, Group CFO- Al Hamra Group & Director -RAK Ceramics India Pvt Ltd,

Email: [Raman.G@shikralimited.com](mailto:Raman.G@shikralimited.com)

Telephone: Direct Board line: +971 7243 4477

ii. If the whistleblower does not feel comfortable in reporting by email to the whistleblower officer, he may directly make his report to any of the member of RAK Ceramics Whistleblower Committee. The Whistleblower Committee consists of following

- a. Chief Legal Counsel, RAK Ceramics-Chairman
- b. Chief Audit & Risk Compliance Officer, RAK Ceramics-Member
- c. General Manager Human Resources Officer, RAK Ceramics-Member

iii. In the event that the whistleblower feels uncomfortable reporting the matter to any of these individuals they should report it directly to either the Chairman of the Audit Committee OR to the Expert to the Audit Committee of the Board of Directors of RAK India.

The contact details of the Whistleblower Committee and the Audit Committee Expert are provided in **annexure 1**.

Timing-The earlier a concern is expressed, the easier it is to take action.

Evidence Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

The Whistleblower Committee shall investigate and complaints / concerns. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation. The Committee may involve other functions such as Internal Control, Legal, HR and Finance in their investigation. The Committee may also seek outside assistance including help from government /regulatory authorities if required. The action taken in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of RAK India shall receive information (anonymized if required) on each report of concern and follow-up information on actions taken.

Further Information -The amount of contact between the complainant and the Whistleblower Committee Investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

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**Control Change**

Issued/ Revised	Effective Date	Key Changes
Initial Issue	26 <sup>th</sup> April 2017	Initial Issue after approval from the Audit Committee and the Board of Rak India
Revised	21 <sup>st</sup> January 2025	The policy has been updated to reflect the changes to the new Whistleblower Officer and Committee Composition.

**Annexure 1**

**Whistleblower Officer**

Raman Garg, Group CFO- Al Hamra Group & Director -RAK Ceramics India Pvt Ltd,

Email: [Raman.G@shikralimited.com](mailto:Raman.G@shikralimited.com)

Telephone: Direct Board line: +97172434477

**RAK Ceramics Whistleblower Committee Contact Details**

Sari Kanan - Chief Legal Counsel, RAK Ceramics

Email: [sari.kanaan@rakceramics.com](mailto:sari.kanaan@rakceramics.com)

Telephone: Direct- +971 7 246 7600

Cell: +971 58 246 8569

Vibhuti Bhushan-Chief Audit & Risk Compliance Officer, RAK Ceramics

Email: [vibhuti.bhushan@rakceramics.com](mailto:vibhuti.bhushan@rakceramics.com)

Telephone: Direct-009712467624 | Board line: 00971 246 7000 Extn. -7624

Cell: 00971504843428

Yasir Arafat - General Manager Human Resources Officer, RAK Ceramics

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