



Date: December 23, 2022

Circular: Whistle Blower Policy for Business Associates

In compliance with Tata Code of Conduct and in furtherance with TRF's policy to encourage and protect genuine Whistleblowing by Business Associates, a Business Associate Whistleblowing Protection 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 an Employee or Director or Business Associate.
- Business Associate Whistle Blower means a person / organization registered in the vendor or customer database 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 Disclosure 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 Whistle Blower.
- Misconduct concerning the Chief Ethics Counsellor and Vigilance and employees at the levels of Vice President and above should be address to the Chairperson of the Audit Committee of the Company and those concerning other employees should be address to the Chief Ethics Counsellor and Vigilance of the Company.
- The Whistle Blower must disclose her / his identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosure will not be entertained as it would not be possible to interview the Whistle Blowers.
- Contact details of the Chairman of the Audit Committee and of the Chief Ethics Counsellor and Vigilance of the Company are as follows:

Mr. Krishnava Satyaki Dutt
Chairman, Audit Committee
Board of Director, TRF Ltd.
E-mail: krishnava.dutt@argus-p.com

Mr. Indraneel Sarkar
Chief Ethics Counsellor & Vigilance
TRF Ltd, 11-Station Road, Burmamines, Jamshedpur - 831001.
E-mail: ethics.counsellor@trf.co.in and indraneel.sarkar@trf.co.in



Protection to the Business Associate Whistle Blower

- The Company, as a policy condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Business Associate Whistle Blower while conducting business with the company.
- The Business Associate Whistle Blower shall be protected from any retaliation, threat or intimidation of the 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 Business Associate Whistle Blower from continuing to execute their jobs, including making further Protected Disclosure. Should, in spite of the best efforts by the Company, the identity of the Business Associate Whistle Blower becomes known during the investigation, the Chief / Head of the concerned user departments, shall ensure that the Business Associate Whistle Blower is provided with all the assistance required to execute existing orders.
- Under no circumstances, subjects against whom the disclosure has been made, should compel investigator to disclose the identity of the Business Associate Whistle Blower.

Disqualification

Any abuse of this protection by the Business Associate will warrant disciplinary action.

Business Associate Whistle Blower Protection

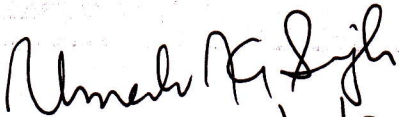
The company has constituted the Ethics Committee. In case a Business Associate Whistle Blower feels that they have been victimized because of reporting about an unethical act, they can submit a Grievance to the Chief Ethics Counsellor and Vigilance, giving specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Ethics Committee. The Ethics Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

Amendment

The company 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

Chief Ethics Counsellor and Vigilance shall ensure that approved copy of this policy and its subsequent amendments, if any, are hosted on the TRF website for information to all Business Associates. This supersedes our earlier Whistle Blower policy on Business Associates.


Umesh Kumar Singh
Managing Director 23/12/2022