

# **GE Power India Limited**

## **Vigil Mechanism (Ombuds & Open Reporting Procedure)**

# GE Power India Limited – Ombuds & Open Reporting Procedure

## 1. INTRODUCTION

GE Power India Limited (hereinafter referred to as “**Company**”) is committed to corporate practices based on principles of transparency, accountability, fairness and integrity to create long term sustainable value for its Stakeholders. The Company encourages its Stakeholders who have Concerns about any actual or potential integrity violation including violations of the legal and regulatory requirements and The Spirit & The Letter (S&L), to report such Concerns without fear of retaliation or unfair treatment.

Accordingly, this Ombuds & Open Reporting Procedure is formulated to ensure the establishment of vigil mechanism and has been formulated in accordance with the extant relevant provisions of Section 177 of the Companies Act, 2013 and the requirements of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to provide an avenue to all Stakeholders to report Concerns, whether actual or potential, about integrity violation or violation of law.

## 2. DEFINITIONS

Term	Description
The Spirit & The Letter	The Spirit & The Letter is a set of global Company policies that cover GE’s integrity commitments on critical subjects and risk areas adopted by the Company. The reference to the Spirit & Letter (“S&L”) as is available at on the website of the Company
Concern	Grievance related to any actual or potential violation of law and the S&L including unethical practices, incorrect or misrepresentation of any financial statements and reports, any claim of theft or fraud, conflicts of interest and any claim of unfair employment practices.
Concern Raiser	Any Stakeholder of the Company reporting a Concern.
Audit Committee	Audit Committee of the Board of Directors of the Company.
Respecting confidentiality	The Company respects confidentiality and allows Concern Raisers to raise Concerns, anonymously if they prefer anonymity.
Stakeholders	All employees, directors, officers, subsidiaries, affiliates as well as third parties representing the Company.

## 3. OBJECTIVE

This Vigil Mechanism (Ombuds and Open Reporting Procedure) has been established in line with the extant provisions of the Companies Act, 2013 and the Listing Agreement(s) with the Stock Exchanges, to achieve the following objectives:

- 3.1. Establish a no threat window; whereby an individual, who is aware of any, perceived wrong-doing in the Company, is able to raise Concerns regarding perceived wrong-doing easily and free of any fear and retaliation.
- 3.2. Ensure necessary investigations and timely remedial action.

## 4. ELIGIBILITY

All Stakeholders are eligible to report a Concern under this Vigil Mechanism (Ombuds & Open Reporting Procedure).

## 5. SAFEGUARDS TO THE CONCERN RAISER

- 5.1. The Company commits that Concern Raiser will not suffer from any form of retaliation, such as a change of status, harassment or any other form of discrimination including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages, as a result of raising a Concern, supporting an investigation or disclosing information in good faith.

- 5.2. The Company will take all measures in Respecting Confidentiality of the Concern Raiser. The Concern Raiser may choose to remain anonymous. Even if the identity of the Concern raise is known it will only be shared on a “need-to-know” basis as follows:
- 5.2.1. The individual agrees to be identified;
  - 5.2.2. Identification is necessary to allow the Company or law enforcement officials to investigate or respond effectively to the report;
  - 5.2.3. Identification is required by law; or
  - 5.2.4. The individual accused of compliance violations is entitled to the information as a matter of legal right in disciplinary proceedings.
- 5.3. If a Concern Raiser faces any retaliation as a result of reporting a Concern or supporting an investigation, he/she should inform the Chairman of the Audit Committee.

## 6. CONCERN RAISING PROCEDURE

### 6.1. Reporting a Concern

Any Stakeholder may use the Company’s Vigil Mechanism (Ombuds & Open Reporting Procedure), if they have reason to suspect a violation of the law or the S&L. This Ombuds & Open Reporting Procedure provides Stakeholders with several channels for raising Concerns and they may use the channel that is most comfortable for them. These channels are as follows:

- Supervisor or manager
- Human resources leader
- Compliance leader or auditor
- Company legal counsel
- Next level of management
- Business or region GE ombudsperson
- A GE Corporate ombudsperson – you can voice your integrity Concerns, anonymously through:
  - P.O. Box 911
  - Fairfield, CT 06824-0911
  - U.S.A.
  - +1 203-373-2603
- [ombudsperson@corporate.ge.com](mailto:ombudsperson@corporate.ge.com)

### 6.2. Investigation

A Concern received through any of the above channels will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action. Everyone working for or with the Company has a duty to cooperate with the investigation process. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action, including termination of employment.

### 6.3. Review by the Audit Committee

If, at the conclusion of its investigation, it is found that a violation has occurred, corrective action commensurate with the nature of the violation will be taken. The corrective actions may include disciplinary action including but not limited to termination. Concerns received as part of the Ombuds & Open Reporting Procedure and respective corrective actions shall be placed before the Audit Committee for review and further directions, if any, as the Audit Committee may consider appropriate.