

## 1. Introduction

Norican Group, which includes Norican Global A/S and all its affiliate and subsidiary entities, (collectively referred to as “Norican”) is committed to conducting its business with honesty, integrity and professionalism and it expects all employees to maintain high standards in line with Norican policies and procedures.

This commitment is enshrined within the Norican Code of Conduct (the “Code”), which also encourages people to “speak up” and report potential, suspected or actual violations of the Code, Norican’s policies and/or any laws and regulations that govern Norican’s operations.

If you see or suspect an action is not in line with the Code, you have a responsibility to speak up. We know that speaking up takes courage, and we commit to taking any concern seriously and sensitively, and investigating where appropriate.

Speaking up contributes to maintaining a culture of integrity and doing the right thing. All managers are responsible for creating a culture of open dialogue, and honest communication with their direct reports. DEVELOPING employee talent, and RESPECTING diversity and teamwork are two of our Values. We can only adhere to these Values if all of us feel comfortable in speaking up.

This Policy contains Norican global standards. In some jurisdictions, more stringent applicable laws and regulations may supersede the principles set out in this Policy.

DISA India Limited (“Company”), subsidiary of the Norican Group believes in the conduct of its affairs and its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour in consonance with the Norican Code of Conduct. Any actual or potential violation of the above Principles or the Group’s Code of Conduct would be a matter of serious concern.

## 2. Objective

This Policy will reassure anyone wishing to make a report that they may do so without fear of victimisation, retaliation, harassment or discipline. This Policy will also reassure anyone against whom a report is made that the details and their identify will be kept confidential until such time as it may be appropriate for such details to be disclosed.

## 3. What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing. This may include, but is not limited to:

- Breach of the Norican Code of Conduct
- Failure to comply with a legal obligation
- Money laundering

- Fraud or corruption
- Unauthorised disclosure of information
- Conflict of interests
- Racial, sexual, disability or other discrimination
- Financial malpractice, impropriety or fraud
- Practices endangering health and safety
- Other unethical, improper and/or illegal conduct

Employees should contact their line manager for issues relating to dissatisfaction in the workplace, as these issues cannot be investigated through the whistleblowing service.

If you are unsure whether something falls under the scope of this Policy, please contact the Norican Group General Counsel.

#### 4. Scope

This Policy applies to all Norican employees, contract workers, officers and directors (“Employees”). It also applies to suppliers, customers, representatives, distributors, agents, or any other third party who acts on behalf of or for the benefit of Norican (“Third Parties”) and includes, but is not limited to, consultants, representatives, agents, brokers, lobbyists, distributors, and resellers. Norican will only engage Third Parties who uphold Norican’s Values and the principles of this Policy.

#### 5. Raising a concern

##### *Step 1*

Norican has an open-door policy and encourages colleagues to share their concerns, suggestions or complaints with their line manager, HR representative, or General Counsel in the first instance. This may be done either verbally or in writing. It may be possible to agree a way of resolving the concern quickly and effectively.

##### *Step 2*

If you are not comfortable speaking with your line manager or other representatives mentioned in Step 1, or you are not satisfied with your line manager’s response, you are encouraged to report a concern to the Ombudsperson as per Annexure A. In appropriate or exceptional cases, the Whistle Blower shall have direct access to the Chairman of the Audit Committee.

#### 6. Handling of reported violations

The person who you raise the concern to, will listen to and consider your concern carefully and determine whether any action is needed. This may mean reporting it to a more senior members of staff or to the General Counsel.

If a person raises a concern directly to a supervisor, manager or the Ombudsperson in person, the message is treated according to this Policy.

### **The whistleblowing team:**

Where a report is made through the Ombudsperson, access to messages is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged and handled confidentially. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound by confidentiality.

### **Receiving a message:**

Upon receiving a report, the whistleblowing team decides whether to accept or decline the report. If the report is accepted, appropriate measures for investigation will be taken.

The whistleblowing team may decline a report if:

- i. the alleged conduct is not reportable conduct under this Whistleblower Policy.
- ii. the message has not been made in good faith or is malicious.
- iii. there is insufficient information to allow for further investigation.

If a message includes issues not covered by the scope of this Whistleblower Policy, the whistleblowing team will take appropriate actions to get the issue solved.

The whistleblowing team will send appropriate feedback within 3 months from the date of receiving the report.

A person making a report should not include sensitive personal information about anybody mentioned in the report if it is not necessary to do so.

### **Investigation:**

All reports are treated seriously and in accordance with this Whistleblower Policy.

- No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.
- A report will not be investigated by anyone who may be involved with or connected to the misgiving.
- The whistleblowing team decides if and how a whistleblowing message should be escalated.
- Whistleblowing reports are handled confidentially by the parties involved.

## Processing of Personal Data:

This whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, in order to investigate facts on the declared misdeeds and inappropriate behaviour eligible under our Code. This processing is based on the legitimate interest to prevent reputational risks and to promote an ethical business activity.

The provided description and facts under this processing are only reserved to the competent and authorized persons who handles this information confidentially. You may exercise your rights of access, of rectification and of opposition, as well as of limited processing of your personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

For any further questions or complaints please address your request to the Norican Group General Counsel.

## Deletion of data:

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws. Permanent deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistle-blower messages that are archived should be anonymised under GDPR; they should not include personal data through which persons can be directly or indirectly identified.

## Person Data Controller:

Norican Global A/S, responsible for the personal data processed within the whistleblowing service.

## 7. Breach of Policy

Breaches of this Policy and of laws applicable to the protection of whistleblowers will not be tolerated and may lead to disciplinary action including dismissal.

## 8. No retaliation

Norican will not tolerate any form of retaliation against anyone who makes a report, raises a concern or helps with an investigation in the reasonable belief there has been a violation of the law, or the Norican Code of Conduct, provided that the report is made in good faith.

Reporting in good faith means providing all the information you have with the belief that such information is true, regardless of whether it later turns out to be mistaken.

Any person who makes a report in compliance with the provisions of this Policy, shall be protected against any acts of retaliation, harassment, victimisation or any other detrimental treatment.

Where employees consider that they have been the victim of retaliation for reporting a violation or have good reason to believe or fear that they are exposed to a risk of retaliation as a result of their reporting a violation, they must notify their line manager, an HR representative or the General Counsel. Anyone involved in any retaliation may be subject to disciplinary actions, including dismissal.

A person who makes a malicious report or makes a report in bad faith based on false or misleading information, shall not be protected and may be subject to disciplinary or legal actions.

## **9. Confidentiality**

Any report made under this Policy will be handled promptly, sensitively and seriously and treated as far as reasonably practicable in a confidential manner. Investigation into the report will be handled by persons with the appropriate level of seniority and expertise.

If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to the reporter and Norican will seek to address any questions or concerns.

The person making a report is expected to keep confidential the fact he/she has reported an alleged breach, the nature of and details associated with the alleged breach, and the identity of all entities and persons referenced in the report.

The identity of any person against whom a report has been made will also be handled sensitively, seriously and confidentially until such time as the report is judged to be well-founded and it is appropriate for the authorities and/or such person(s) to be notified.

Where the law permits, a report may be made anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate, and so we encourage all reporters to be open with their identity.

## **10. Reporting:**

A quarterly report with number of complaints received under the Policy and their outcome shall be placed before the Board of Directors of the Company by the Ombudsperson.

## **11. Retention of Documents:**

All protected disclosures in writing or documented along with the results of the investigation relating thereto shall be retained by Company's Compliance Officer for a minimum period of one year.

## 12. Amendment:

The Board of Directors of the Company has the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever.

## 13. Who to contact?

If you have any questions about this Policy or need further guidance, please contact the General Counsel.

## Annexure A

The Company's Board has nominated **Mr. Ismail Wadee** as the Ombudsperson. Mr. Wadee is the General Counsel, for the Norican Group, and he is based in Altrincham, United Kingdom.

### Ombudsperson's contacts are:

Mr. Ismail Wadee

- Email ID: [ismail.wadee@noricangroup.com](mailto:ismail.wadee@noricangroup.com)
- Mobile No.: +447904 791863

On receipt of any Whistle Blower Complaint, Mr. Wadee will liaise with Mr. Bhagya Chandra Rao – Chairman of DIL Audit Committee and other Independent Directors on DIL Board.

### Audit Committee Chairman's contacts are:

Mr. Bhagya Chandra Rao

Flat No 5193, One Bangalore west apartment,  
No 1, Dr Rajkumar Road, Rajajinagar, Bengaluru 560010.

- Email ID: [bhagyac.rao@gmail.com](mailto:bhagyac.rao@gmail.com)
- Phone No. +91 9538070755

### Audit Committee Member's Contacts are

Ms. Deepa Hingorani

- Email ID: [DHI@IFU.DK](mailto:DHI@IFU.DK)
- Office Phone No.
  - o Singapore: +65 90 66 75 91
  - o Denmark: +45 33 63 75 29
  - o India: +91 98 11 09 69 08

**Sd/-**

**Managing Director  
DISA India Limited**