

3i Infotech Limited

Whistle Blower Policy

3i Infotech Limited has been consistently adopting the professional and transparent policies and practices in accordance with the global standards of best practices and governance. The Company as a part of implementing the global best practices has decided to put in place a whistle blower policy to enable the employees and Directors to participate in fostering the transparent practices in the organisation.

As per the Policy, the employees and Directors are free to communicate any matters of concern in the areas of accounts, finance, management, operations, employment and other affairs of the Company and its subsidiaries and discuss the same in terms of this policy.

Applicability

The policy is applicable to all the employees and Directors of the Company and its subsidiaries.

Operation

- The employees may raise genuine concerns relating to accounts, finance, management, operations, employment, unethical behavior, actual or suspected fraud or violation of the Company's code of conduct and other affairs of the Company and its subsidiaries.
- There shall be a committee comprising of the head of HR and Compliance officer who shall address issues raised by the employees or directors and the compliance officer shall report the same to the Audit Committee/Board as under:
 - The Accounting/finance related issues should be reported to the Audit Committee, which shall after considering the same, brief the Board.
 - All the other matters to the Board.

Communication

The communication by the employees should be under their name and signature and should not be anonymous. Communication may be made in writing through a letter or through email. Employees may send their communications to:

Mr. Rajeev Limaye
Compliance Officer & Company Secretary
3i Infotech Limited
Tower #5, 5th floor, 'C' Block, International Infotech Park
Vashi, Navi Mumbai 400 703
Email: RAJEEV.LIMAYE@3i-infotech.com
Ph: +91-22-6792 8595

Obligations

The Committee shall maintain strict confidentiality of the communication received by the employees. The Company shall ensure adequate protection to "whistle blowers" and ensure that it shall not impact on the employee's performance appraisal, assignment of work or other matters related to employment with the Company or its group companies. However, the communication, if any found to have been vexatious, libelous and unfounded and made with mala fide intention will be dealt with punitively. Repeated frivolous complaints would also be liable to action by the Board or Audit Committee. The decision of the Audit Committee in respect of any matters raised under this policy shall be final and binding on employee or Director raising the matter.

The communication in respect of matters relating to the whole time directors may be brought to the notice of the Chairman of the Board directly by the employees.

If the employee is not satisfied with the action taken by the Committee on the matter, he can get in touch with the Chairman of the Audit committee. The contact details of the Chairman of the Board and Chairman of the Audit Committee of the Company for the purposes of this Policy are put up on the intranet for the reference of the employees.