	The Hub Power Company Limited	Speak Up Policy
	Approved by Board on April 30, 2015	

1. Preface

- The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. This has always been our core strength and is reinforced through voluntary reporting of irregularities and implementation of ethics related policies.
- The Company is committed to developing a culture where it is safe for all employees, customers and vendors to raise concerns about any poor or unacceptable practice and any event of misconduct.
- The purpose of this policy is to provide a framework to promote responsible and secure manner to speak up. It protects employees, customers and vendors wishing to raise any concern they have regarding business ethics, safety, environmental performance, harassment and other possible breaches of compliance.
- The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

2. Policy

This policy is for the Employees, Customer and Vendors (collectively referred to as 'persons').

3. The Guiding Principles


To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

- Ensure that the person who speaks up and/or the person investigating the Protected Disclosure is not victimized for doing so;
- Treat victimization as a serious matter including initiating disciplinary action on such person (s);
- Ensure complete confidentiality.
- Not attempt to conceal evidence of the Protected Disclosure;
- Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made;
- Provide an opportunity of being heard to the persons involved especially to the Subject.

4. Coverage of Policy

The Policy covers malpractices and events which have taken place / suspected to take place involving:

- i. Abuse of authority
- ii. Breach of contract
- iii. Negligence causing substantial and specific danger to public health and safety
- iv. Breach of Environmental obligations and safety and health standards
- v. Manipulation of Company data / records

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- vi. Financial irregularities, including fraud, or suspected fraud
- vii. Criminal offence
- viii. Perforation of confidential / propriety information
- ix. Deliberate violation of law / regulation
- x. Wastage / misappropriation of Company funds / assets
- xi. Breach of employee Code of Conduct or Rules
- xii. Any other unethical, biased, favored and imprudent event

Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

5. Disqualifications

- While it will be ensured that persons who speaks up are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a person knowing it to be false or bogus or with a *mala fide* intention.
- Persons, who make any Protected Disclosures, which have been subsequently found to be *mala fide*, *frivolous* or *malicious*, shall be liable to be disciplinary action under Company's Code of Conduct / Personnel Policy.

6. Manner in which concern can be raised


Employees are encouraged to raise their concerns first with their line managers. However, if they are not comfortable in doing so, they should email to speakup@hubpower.com to raise their concerns. Alternatively they can approach in person to Head of Audit or Chairman BAC. It is requested to raise your concerns within 30 days of becoming aware of the situation.

Every effort will be made to maintain confidentiality of the complainants and to protect him / her from any unfair treatment.

The Company undertakes that all complaints will be investigated and feedback will be provided to the complainant(s).

7. Protection

- No unfair treatment will be meted out to a person who speaks up by virtue of his / her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against the person who speaks up. Complete protection will, therefore, be given to the person against any unfair practice such as retaliation, threat or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behavior or the like including any direct or indirect use of authority to obstruct the person's right to continue to perform his duties / functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which a person / an employee may experience as a result of making the Protected Disclosure.

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- The identity of the person shall be kept confidential.
- Any other employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the complainant.