

STERLITE TECHNOLOGIES LIMITED WHISTLEBLOWER POLICY

This Policy is approved by the Board of Directors of Sterlite Technologies Limited at its meeting held on January 24, 2019 and is effective from the date of approval

Complaints and the Investigation Procedures

The following procedures (vigil mechanism) have been adopted by the Board of Directors of Sterlite Technologies Limited (the “Company”) to govern the receipt and treatment of Complaints and to protect the confidentiality and anonymous reporting of the same. This Policy and its procedures apply to and are available to all directors, employees of the Company, its subsidiaries and all external stakeholders.

I. POLICY

Directors and Employees have the opportunity to submit / report ‘Complaints’ pertaining to the following areas such as:

- a) fraud (an act of willful misrepresentation which would affect the interests of the concerned) against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to the Securities and Exchange Board of India (the “SEBI”), the relevant stock exchanges, any other relevant authority or members of the investing public.
- b) violations of any rules and regulations applicable to the Company and related to accounting, internal accounting controls and auditing matters
- c) intentional error or fraud in the preparation, review or audit of any financial statement of the Company
- d) any violations to the Company’s ethical business practices as specified in the Company’s Code of Business Conduct and Ethics
- e) any other event which would affect the interests of the business

The Company will protect the confidentiality and anonymity of the complainant to the fullest extent possible with an objective to conduct an adequate review. External stakeholders such as vendors, customers, business partners etc. have the opportunity to submit ‘Complaints’; however, the Company is not obligated to keep ‘Complaints’ from non-employees confidential or to maintain the anonymity of non-employees. We encourage individuals sending ‘Complaints’ / raising any matter to identify themselves instead of sending anonymous ‘Complaints’ as it will assist in an effective complaint review process.

The Company will also provide for adequate safeguards against victimization of employees who avail of the mechanism and will get opportunity of being heard by the Chairman of the Audit Committee, if aggrieved of any action under this Policy.

Post review, if the ‘Complaint’ is found to have been made with *mala fide* intention or in case of repeated frivolous complaints, stringent action will be taken against the complainant including reprimand. We encourage employees to report genuine ‘Complaints’ in good faith.

II. PROCEDURES

Receipt of Complaints

All the 'Complaints' under this policy should be reported to the Group Head - Management Assurance, who is independent of operating management and businesses. The various ways in which a complaint can be made are as under:

1	Web based Portal	www.vedanta.ethicspoint.com
2	Toll Free number	000 800 100 1681
3	Email	stl.whistleblower@sterlite.com
4	Mailing address	Group Head – Management Assurance, Vedanta, 75 Nehru Road, Vile Parle (E), Mumbai 400 099 Tel No. +91- 22 – 6646 1000 , Fax No. +91- 22 – 6646 1450

If a 'Complaint' is received by any other executive of the Company, the same should be forwarded to the Group Head – Management Assurance at the above address.

Treatment of Complaints

1. Group Head - Management Assurance shall review the 'Complaint', and may investigate it himself or may assign another employee, any committee, outside counsel, advisor, expert or third party service provider to investigate, or assist in investigating the 'Complaint'. Director - Management Assurance may direct that any individual assigned to investigate a 'Complaint' work at the direction of or in conjunction with Director - Management Assurance or any other attorney in the course of the investigation.
2. The person/persons against or in relation to whom the 'Complaint' is made shall co-operate with the investigator and have the right to provide their inputs during the investigation
3. At least once in every six months and whenever else as deemed necessary, Director - Management Assurance shall submit a report to the Audit Committee and any other member of Company management that the Audit Committee directs to receive such report, that summarizes each 'Complaint' made within the last 12 months and shows specifically: (a) the complainant (unless anonymous, in which case the report will so indicate), (b) a description of the substance of the 'Complaint', (c) the status of the investigation, (d) any conclusions reached by the investigator, and (e) findings and recommendations.



Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with 'Complaints' are considered confidential information and access will be restricted to members of the Audit Committee, Director – Management Assurance and any other person as permitted by the Director – Management Assurance. 'Complaints' and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at that time.

Retention of Records

All documents relating to such 'Complaint's made through the procedures outlined above shall be retained for at least five years from the date of the 'Complaint', after which the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry, or investigation, in which case the information will be retained for the duration of that litigation, inquiry, or investigation and therefore as necessary.

Amendment to the Policy

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever and the same will be posted on the Company website.