



## WHISTLEBLOWING POLICY

Adopted – October, 2023  
Last Updated – December, 2025

### ZIGMA GLOBAL ENVIRON SOLUTIONS PRIVATE LIMITED WHISTLEBLOWING POLICY

#### Introduction and Purpose

Blue Planet Environmental Solutions Pte Ltd and its subsidiaries and affiliates (hereinafter collectively referred to as the “Blue Planet Group”) do not tolerate any wrongful act, impropriety, or statutory non-compliance by its employees, officers, directors, and associates. Zigma Global Environ Solutions Private Limited (“Zigma/Company”) as adopted a whistleblowing policy as per Blue Planet Group’s compliance initiative and mandate.

The Company is committed to developing a culture where it is safe for all persons to raise concerns or grievances on various matters pertaining to any malpractice, fraud, violation of code of conduct, abuse of power or authority, misconduct, impropriety, or wrongdoing within the organization.

This Whistleblowing Policy (the “**Policy**”) is intended to provide a framework to promote responsible and secure whistleblowing without fear of reprisal when whistleblowing in good faith. This Policy lays down the principles and procedure to be followed in such cases.

#### 1. Definitions

- 1.1. “**Anonymous Reporting**” means the submission of a Protected Disclosure without disclosure of the Whistleblower’s name or other personally identifiable information or where the Whistleblower has requested that their identity be kept anonymous, through reporting mechanisms designed to reasonably preserve the anonymity of the Whistleblower.
- 1.2. “**Compliance Committee**” means the committee of the Board of Directors of Blue Planet Environmental Solutions Pte Ltd, constituted as a sub-committee, entrusted with oversight of compliance, ethics, ESG and whistleblowing matters, including supervision of the whistleblowing mechanism and review of whistleblowing cases and outcomes.
- 1.3. “**Protected Disclosure**” means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity, including the items covered under clause 3 below. Protected Disclosures should be factual and not speculative in nature.
- 1.4. “**Whistleblower**” means someone who makes a Protected Disclosure under this Policy.
- 1.5. “**Good Faith**” means there is a reasonable basis for reporting the unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge on a factual basis for reporting about the unethical and improper practices or alleged wrongful conduct and/or is aware that the



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reporting is malicious, false or frivolous.

### 1. **Who can report under this Policy?**

- 2.1. Employees of the Company; and
- 2.2. External parties including but not limited to contractors, vendors, clients, suppliers, customers, affiliates of the Company etc.



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### 3. What should be reported under this Policy?

3.1. All stakeholders are eligible to make Protected Disclosures under the Policy. The Protected Disclosures may be in relation to matters concerning the Company or any of its subsidiaries or group companies. Whistleblowers may use the procedures set out in the Policy to report the following:

- (a) Any wrongdoings conducted;
- (b) Fraudulent activities;
- (c) Bribery, Corruption, and deception;
- (d) Conflict of interest and abuse of authority;
- (e) Negligence or causing substantial and specific danger to public health and safety;
- (f) Manipulation of Company data / records;
- (g) Financial irregularities, including fraud or suspected fraud or deficiencies in internal controls and checks or deliberate error in preparations of financial statements or misrepresentation of financial reports;
- (h) Pilferage of confidential / propriety information;
- (i) Deliberate violation of law / regulation;
- (j) Wastage / misappropriation of Company funds / assets;
- (k) Any instance of failure to comply with legal or statutory obligation either on behalf of the Company or in any personal capacity in the course of discharging duties of the Company (excluding any routine or procedural delays / omissions of a minor nature and curable through monetary fines in accordance with applicable laws);
- (l) Retaliation;
- (m) Breach of IT Security and data privacy;
- (n) Breach of any Company Policy or failure to implement or comply with any approved Company Policy.

### 4. How is reporting done under this Policy?

- 4.1. A person intending to make any Protected Disclosure is required to disclose all relevant information at the earliest from the day on which he/she knew of the Protected Disclosure.
- 4.2. All Protected Disclosures should preferably be factual and not speculative in nature and should be reported in writing. It should contain relevant material information for an effective investigation to be conducted.
- 4.3. The Protected Disclosure should include basic information such as parties involved. Additional information that can be provided should comprise of more data, time, type of wrongdoing, evidence substantiating the wrongdoing, and contact details.
- 4.4. All the reports containing the Protected Disclosure should be made to the Whistleblower Officer



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(“WBO”) of the Company via email or any other written mode. The WBO shall be appointed by the Compliance Committee. Any change in the appointment of the WBO shall be similarly communicated. The details of the current WBO are provided below. Any change in the appointment of the WBO shall be communicated to all employees through trainings, employee handbooks, and mass email communications, and shall be updated from time to time:

Name	Email Address	Location
Dhananjay Jitesh Pandey	Dhananjay.pandey@blue-planet.com	Corporate Office- New Delhi, India

Alternatively, reports can be made anonymously to the Whistleblower Hotline at [speakup@zigma.in](mailto:speakup@zigma.in). Such reports will then be forwarded to the WBO of the Company. Whistleblowers are encouraged, but not required, to disclose their identity when submitting a Protected Disclosure. Where a Whistleblower discloses their identity, the Chief Compliance Whistleblower Officer shall, at the outset, seek confirmation from the Whistleblower as to whether they wish their identity to be kept anonymous or confidential during the investigation process. The Company shall take all adequate measures as per this policy to protect the anonymity or confidentiality of the Whistleblower, as requested, irrespective of the reporting channel used. Whistleblowers who prefer not to disclose their identity may submit Protected Disclosures through the physical grievance boxes or postal reporting mechanisms described below. This whistleblower hotline should be accessible to all stakeholders and the WBO shall ensure that all stakeholders are aware of the same.

- 4.5. Upon receipt of a Protected Disclosure, the WBO shall act as the initial recipient and shall log all cases and undertake a preliminary assessment and triage based on the nature, seriousness, and potential risk of the matter. Such preliminary assessment shall, inter alia, consider whether the Protected Disclosure contains sufficient and credible information to enable appropriate action, including:
- (a) clarity of the allegations and relevant facts;
  - (b) identification of the person(s) against whom the allegations are made;
  - (c) availability of supporting information or evidence, where applicable; and
  - (d) the ability of the Company to reasonably investigate and act upon the disclosure.
- 4.6. Based on the assessment, Serious or high-risk cases, including but not limited to those involving senior management, potential regulatory or legal breaches, significant reputational exposure, or material financial implications, shall be escalated immediately to the Chair of the Compliance Committee.
- 4.7. Protected Disclosures involving the Chief Executive Officer or members of senior management shall be automatically escalated to the Chair of the Compliance Committee and, where



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considered appropriate, to the Chair of the Board. Based on such preliminary assessment of the WBO, themselves look into the matter the WBO may set up an investigation committee for this purpose (“**Investigation Committee**”).

4.8. The Investigation Committee shall adhere to the following process of investigation:

- (a) The Investigation Committee will acknowledge receipt of a complaint by a Whistleblower where contact details are available or where anonymous follow-up is reasonably possible.
- (b) The Investigation Committee will determine whether the complaint actually pertains to a compliance or an ethical violation within 14 business days of receipt of a complaint.
- (c) If the Investigation Committee decides that the complaint is not valid, wherever possible, the committee members will communicate the rationale for the decision to the Whistleblower. However, the Whistleblower can escalate the matter by sending an email to the Company at the parent entity level, if required. \
- (d) The subject of the investigation will be informed of the allegations at the outset of a formal investigation and have opportunities for providing his/her input during the investigation.
- (e) If the Investigation Committee determines that the complaint is valid, it will investigate into the alleged violation. The Investigation Committee will prepare an investigation report, along with recommendations for corrective action.
- (f) The Investigation Committee will make all reasonable efforts to ensure that the investigation process is completed within [60] days from the day of the receipt of a complaint.
- (g) The Investigation Committee will follow the principles of natural justice when undertaking the investigation.
- (h) The members of the Investigation Committee will jointly make a decision based on the findings and provide recommendations.
- (i) The investigation report, along with the supporting documentation, evidence, observation, and recommendation will be submitted to the WBO.



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- (j) The WBO shall submit the investigation report to the Compliance Committee and, upon review or direction of the Compliance Committee, shall direct the Company to implement its final decision.
- (k) In the event of any violation of applicable laws, contracts and policies or action in a manner detrimental to the Company, found to be true and existing, then the WBO shall recommend corrective / disciplinary measures as deemed appropriate.
- (l) All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of 7 years.

### 4.8A. Physical Whistleblower / Grievance Boxes

- (a) The Company shall install locked and clearly marked **Whistleblower / Grievance Boxes** at its corporate office, project sites, and other locations as determined by the Company from time to time.
- (b) These boxes are intended to enable Whistleblowers to submit Protected Disclosures anonymously, without disclosing their identity.
- (c) Grievance boxes shall be opened only by the WBO or the Compliance Officer of the Company, in the presence of a designated independent senior employee.
- (d) A record of opening of the grievance boxes shall be maintained, and all contents shall be handled in strict confidence.



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- (e) Any unauthorised access to, or tampering with, a grievance box shall be treated as serious misconduct.

4.8B. Whistleblowers may submit Protected Disclosures anonymously by sending a written communication, without a return address if they so choose, by post to:

Mr. Dhananjay Jitesh Pandey, Whistle Blower Officer (Confidential)

**Blue Planet Environmental Solutions Pte Ltd**

Unit No. 306, 3rd Floor, Worldmark 1, Asset Area No. 11,

Delhi Aerocity, New Delhi – 110037, India

M: +91 9582744059 | L: +91 11 40059100

## 5. Guiding Principles

### 5.1. Conflict of Interest and oversight:

- (a) The Investigation Committee shall be constituted in a manner that ensures independence, objectivity, and absence of conflict of interest. No member of the Investigation Committee shall participate in the investigation of a Protected Disclosure where such member:
- (I) is the subject of the complaint;
  - (II) is directly or indirectly involved in, or has a personal or professional interest in, the matter under investigation; or
  - (III) has any other actual, potential, or perceived conflict of interest that may compromise impartiality.
- (b) Any member identified as having a conflict of interest shall recuse themselves from the investigation process, and an alternate member shall be appointed.
- (c) The WBO shall ensure that conflicts of interest are identified and appropriately addressed at the time of constituting the Investigation Committee and throughout the investigation process.
- (d) The whistleblowing process, including receipt, investigation, escalation, and closure of Protected Disclosures, shall be carried out under the overall supervision and oversight of the Compliance Committee, being a sub-committee of the Board of Directors.
- (e) Where the WBO has an actual, potential, or perceived conflict of interest in relation to a Protected Disclosure, including where the WBO is the subject of the complaint or is otherwise connected to the matter, the WBO shall recuse themselves immediately



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from all aspects of handling, assessment, investigation, and decision-making in respect of such disclosure. In such cases, the Protected Disclosure shall be directly escalated to the Chair of the Compliance Committee, who shall assume oversight of the matter and may appoint an alternate independent officer or external advisor to





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discharge the responsibilities ordinarily performed by the WBO for that case.

### 5.2. Anonymous Reporting:

- (a) The Company permits and supports Anonymous Reporting of Protected Disclosures.
- (b) Whistleblowers are not required to disclose their name or any personally identifiable information when submitting a Protected Disclosure.
- (c) Anonymous Reporting may be made through physical grievance boxes or postal communication. These mechanisms are designed to reasonably preserve the anonymity of the Whistleblower.
- (d) Reporting through email may result in the disclosure of identifying information. Whistleblowers who wish to remain anonymous should use the physical or postal reporting mechanisms.
- (e) Anonymous disclosures shall be evaluated and investigated based on the seriousness, credibility, and sufficiency of the information provided.

### 5.3. False Allegations:

- (a) While the Policy aims to protect genuine Whistleblower from any unfair treatment consequent to their report, it strictly prohibits frivolous, untrue complainants, or use of channel for taking up personal grievances. If allegations are proven to be malicious, appropriate actions, including legal action and blacklisting, may be taken.

### 5.4. Confidentiality

- (a) The Company shall endeavour to take every effort to ensure the identity of Whistleblower are kept confidential throughout the process.
- (b) All Protected Disclosures shall be kept confidential, as far as possible, consistent with the need to conduct a thorough investigation.
- (c) Violation of the confidentiality obligations shall be considered a serious offence and may warrant disciplinary action (including termination).
- (d) In case of Anonymous Reporting, the Company shall not attempt to identify or trace the Whistleblower, unless required to do so by law or a regulatory authority.



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### 5.5. Good Faith

- (a) A Whistleblower must raise a concern in Good Faith and should have reasonable grounds to believe that the available information indicates some violation.
- (b) All allegations that prove to be frivolous, malicious, or self-seeking would be seen as a serious offence and may warrant disciplinary action (including termination).

### 5.6. Transparency / Fair Process

- (a) The Company will ensure transparency during the investigation and reporting process.
- (b) The Company will provide the subject and the persons involved in the investigation process an opportunity to be heard.
- (c) If anyone destroys or conceals evidence of the reported concern made / to be made, the Company can take disciplinary action against them.

## 6. **Protection for Whistleblowers**

6.1. Complete protection shall be given to Whistleblowers against any unfair practice like retaliation, threat or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion, including any direct or indirect use of authority to obstruct the Whistleblower's right to continue to perform his/her duties / functions including making further Protected Disclosures:

- (a) The Company will take steps to minimize difficulties, which the Whistleblower may experience as a result of making the Protected Disclosure.
- (b) Whistleblowers who acted in good faith, raised genuine Protected Disclosures under this Policy will not be at risk of losing their jobs or be subjected to any kind of harassment or pressure from the Management.
- (c) The Company will take appropriate action to protect and keep confidential the identity of Whistleblowers who raise Protected Disclosures in good faith, unless forced by circumstances to reveal their identity, in which case the Whistleblower will be taken into confidence and his/her interests adequately protected.
- (d) Any other person assisting in the said investigation shall also be protected to the same extent as the Whistleblower.



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- 6.2. However, protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus or with a mala fide intention.

### 7. **Amendments to this Policy**

- 7.1. The Company reserves the right to modify the contents to maintain compliance with applicable laws and regulations or accommodate organisational changes.

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