

COMPLAINT HANDLING POLICY OF NMDC STEEL LIMITED VIGILANCE

NMDC Steel Limited, Vigilance is headed by Chief Vigilance Officer (CVO).

1. Jurisdiction of NMDC Steel Limited Vigilance

- 1.1. Complaint can be lodged only against employees and/or matters of NMDC Steel Limited.*
- 1.2. NMDC Steel Limited Vigilance has no jurisdiction over private individuals/organization.*
- 1.3. NMDC Steel Limited Vigilance investigates issues concerning employees and/or matters of NMDC Steel Limited. With respect to issues of organizations other than NMDC Steel Limited, the complaint will not be considered.*

2. Lodging of Complaint

- 2.1. Complaint can be lodged through:*
 - a) "Vigilance Complaint" link available on vigilance tab of NMDC Steel limited Website*
 - b) Addressing a letter directly to CVO on postal address below:*

Chief Vigilance Officer
NMDC Steel Limited,
Khanij Bhavan, 10-3-311/A,
Castle Hills, Masab Tank,
Hyderabad- 500028, INDIA.
- 2.2. All complaints sent through letter should contain complete name and postal address (including mobile/telephone number, if any) of the sender with specific details/information of the matter and should be super-scribed with:*

"Confidential - To be opened by the addressee only"
- 2.3. Complaint should either be lodged through complaint form link available on NMDC Steel Limited website or through letter addressed to CVO only. Complaint sent on any e-mail ID of NMDC Vigilance or marked as a copy to NMDC Steel Limited Vigilance (either to CVO or to any VO) will not be entertained or taken cognizance of by NMDC Steel Limited Vigilance.*
- 2.4. No fee shall be chargeable for lodging complaints.*
- 2.5. A complaint should preferably be lodged in typed or written form in English or Hindi language for facilitating early action thereon.*
- 2.6. NMDC Steel Limited Vigilance may dismiss a complaint which does not meet the prescribed criteria.*

3. Action taken on complaint in NMDC Steel Limited Vigilance

- 3.1. As NMDC Steel Limited Vigilance handles only with matters of corruption, redressal of grievances should not be the focus of any complaint made to NMDC Steel Limited Vigilance.*
- 3.2. Complaints must contain factual details, verifiable facts and other related matters. They should not be vague or contain sweeping general allegations. Such complaint which is vague and contains sweeping / unverifiable allegation shall not be considered for further action/investigation.*
- 3.3. NMDC Steel Limited Vigilance does not entertain anonymous/pseudonymous complaint.*
- 3.4. After registration of complaint and confirmation of veracity of the complainant (if required), further correspondence in the matter regarding the outcome of the complaint will not be entertained. However, NMDC Steel Limited Vigilance will*

ensure that the complaint is examined/investigated and action taken to its logical conclusion as per extant guidelines of CVC. Further, the gist of allegations may be shared with the employee(s) whose name(s) appear(s) in the complaint or whose role emerge(s) during investigation of the complaint.

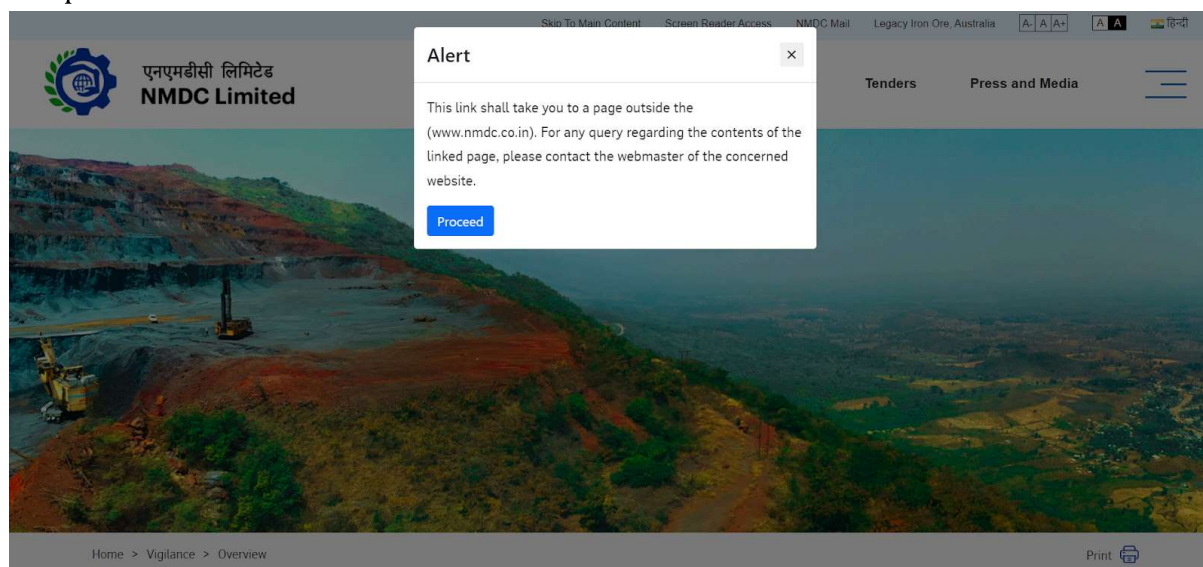
- 3.5. As regard to complaint received against tenders which are under process, it is clarified that while NMDC Steel Limited Vigilance would get the matter investigated, however, it would not interfere in the tendering process as such. The intention is not to stop the work in the organization.
- 3.6. Complaint having administrative issues will be forwarded to respective designated authority as applicable, for necessary action. Further, gist of allegations may be shared with the employee(s) whose name(s) appear(s) in the complaint.
- 3.7. Complaint covered under Integrity Pact (IP) will be forwarded to Independent External Monitors (IEMs) for further necessary action.
- 3.8. "Complaint under the Public Interest Disclosure" or "PIDPI" received from CVC is investigated /dealt as per the set procedure/instruction of CVC.
- 3.9. In case it is found that complaint is malicious, vexatious or false and the complaint has been filed with the intent to harass officials, suitable action including initiation of prosecution under Section 182 of Indian Penal Code, 1860 may be recommended against the complainant.

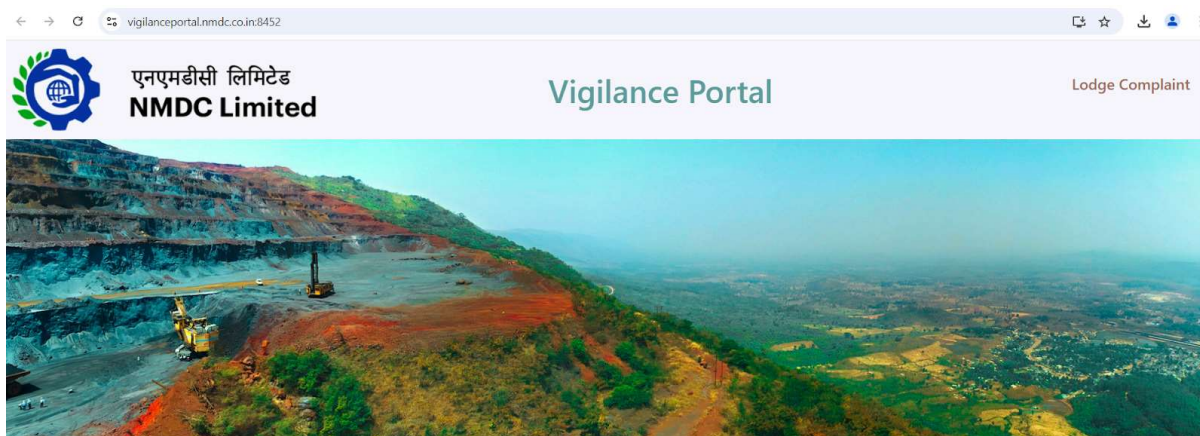
4. Complaint Under NMDC Whistle Blower Policy

- 4.1. NMDC Steel Limited has its own Whistle Blower Policy, which is available on NMDC Steel Limited Website.
- 4.2. All employees of NMDC Steel Limited who observe any unethical/corrupt practices or act and are willing to make "Protected Disclosures" against such, he/she may do so as per laid down procedure of the NMDC Steel Limited Whistle Blower Policy. Identity of the employee making protected disclosure would strictly be kept confidential.

1 Vigilance Complaints:

Similar to NMDC Limited website link is to be given to portal for lodging and managing complaints online. Screen shots of NMDC limited website is attached below:





Overview

Each department/organization covered under the normal advisory jurisdiction of the Central Vigilance Commission needs to have a vigilance department headed by a senior level officer designated as the

- 2 **ISO Certification:** Not applicable presently, so no tab is proposed to be kept in NSL website.
- 3 **Event Gallery:** Tab may be kept uploading photographs of events as and when required.
- 4 **Whistle blower policy:** Presently, not proposed to be kept under vigilance Tab.
- 5 **System Improvements:**
 - 5.1 System Improvements Implemented (Link to upload single/multiple Pdf may be given for uploading/updating data from time to time, say year wise)
 - 5.2 Suggestions for system improvement: (Link to upload single/multiple Pdf may be given for uploading/updating data from time to time say year wise)
- 6 **Knowledge base:** All the booklets available in NMDC Limited website may also be inserted under this tab in line with NMDC Limited website.