

	<b>ANCO/HR/30</b>	<b>Whistleblower Policy</b>	<b>Rev:01 / Sept-18</b>
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**A. PURPOSE:**

The purpose of this policy is to articulate the Company’s point of view on whistle blowing, the process, and the procedure to strengthen the whistle blowing mechanism at the Company.

**This policy:**

- Provides a platform and mechanism for the Employees and Directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- It provides an environment that promotes responsible and protected whistle blowing. It reminds Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Group Values or the Company’s Code of Conduct.
- Above all, it is a dynamic source of information about what may be going wrong at various levels within the Company, which will help the Company in realigning various processes and to take corrective actions as part of good governance practice.

**B. OBJECTIVE OF THE POLICY:**

The objectives of the Policy are as mentioned below:

- To adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

- To create a window for any person who observes an unethical behaviour, actual or suspected fraud, or violation of the Company's code of conduct or ethics policy (hereinafter "**Unethical and Improper Practices**"), either organizationally or individually to be able to raise it.
- To encourage timely, safe and open reporting of alleged wrong doings or suspected impropriety
- To ensure appropriate reporting of whistleblower investigations
- To encourage ethical and lawful conduct
- To provide adequate safeguards against victimization of persons.

#### **C. SCOPE & APPLICABILITY:**

- This policy is applicable to all the Units/Locations in India, including all employees and Business Unit Heads.
- This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.
- Contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company
- Customers of the Company
- Any other person having an association with the Company

#### **D. PROCEDURE:**

##### **1. DEFINITIONS:**

- Whistle Blower**- Any Employee, Business Unit Heads or third party who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct or the Group Values. This whistleblower has come to the decision to make a disclosure or express a genuine concern/grievance/allegation, after a lot of thought.
- Whistle Blower Committee** - The committee who has been constituted to deal with Complaints under this Policy.

- c. **Complaint**: The reporting of any such Unethical and Improper Practice or violation to the Whistle Blower Committee (as defined above) by a Whistleblower made in good faith would constitute a complaint.
- d. **“Frivolous Complaint”** means any complaint which is registered or attempted to be registered under this Policy with no evidence or on hearsay basis or with malafide intentions against the Subject arising out of false or bogus allegations.
- e. **“Protected Disclosure”** means any communication made in good faith that discloses or demonstrates information that may evidence illegal or unethical behaviour.
- f. **“Good Faith”**: An employee shall be deemed to be communicating in “good faith” if there is a reasonable basis for communication of 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 the communication or where the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.

## 2. **REPORTING IN GOOD FAITH:**

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely based on hearsay or rumour. This also means that no action will be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the committee shall take appropriate disciplinary or legal action against the concerned whistleblower.

### **3. LIST OF EXCLUSIONS:**

The following types of complaints will ordinarily not be considered and taken up:

- Complaints that are Illegible.
- Complaints those are trivial or frivolous in nature.
- Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body.
- Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed.
- Issue raised, relates to service matters or personal grievance (such as increment, promotion, appraisal etc.) or also any customer/product related grievance.

### **4. DEALING WITH ANONYMITY:**

A whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

### **5. PROTECTION TO WHISTLEBLOWER:**

If one raises a concern under this Policy, he/ she will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes discrimination, reprisal, harassment or vengeance in any manner. Company's employee will not be at the risk of losing her/ his job or suffer loss in any other manner like transfer, demotion, refusal of promotion, or the like 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 Disclosure, as a result of reporting under this Policy

## **6. PROCEDURE FOR RAISING A COMPLAINT:**

A whistleblower can make a complaint in multiple ways:

- Writing to the Company Secretary or Business Unit Head , as these officials are duty bound to share the complaint with the Ethics mail ID .
- Sending a complaint to [whistleblower@anbros.com](mailto:whistleblower@anbros.com), Plot no 32, Sector 18 (HUDA) Near Honda Service Station Gurgaon – 122015, Haryana.
- In exceptional cases the complainant can directly report his / her complaint to the MD of the Company, whose details are available with all employees and at reception.

## **7. RESPONSIBILITIES:**

### **Responsibilities of Whistle Blower**

- Bring to early attention of the Company any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern. Delay in reporting may lead to loss of evidence and also financial loss for the Company.
- Avoid anonymity when raising a concern.
- Co-operate with investigating authorities, maintaining full confidentiality
- Maintain confidentiality of the subject matter of the Disclosure and the identity of the persons involved in the alleged Malpractice. It may forewarn the Subject and important evidence is likely to be destroyed.
- In exceptional cases, where the whistleblower is not satisfied with the outcome of the investigation carried out by the Whistle Officer or the Committee, he/ she can make a direct appeal to the MD of the Company

### **Responsibilities of Whistle Blower Officer and Committee:**

- Conduct the enquiry in a fair, unbiased manner
- Ensure complete fact-finding
- Maintain strict confidentiality
- Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom.
- Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures.
- Minute Committee deliberations and document the final report.

### **8. WHO IS A WHISTLE BLOWER OFFICER & COMMITTEE MEMBERS:**

For the purpose of this policy, the whistle blower officer will be HR Head of the Company.

Whistle Blower Committee consists of following members:

- Mr. Anil Singh (Business Unit Head) – Chairman of the Committee
- Mr. Ranjeet Singh (Head HR) – Whistle Blower Officer
- Mr. Satish Kaushal (Section Head– P&IR) – Member Secretary (GGN)
- Mr. Naresh Midha (Section Head – P&IR) – Member Secretary (LLR)
- Mr. Keshav Sharma (Incharge – P&A) – Member
- Mr. Amrender Singh (Head – Production) – Member
- Mr. Joseph K (Head – QA & Tech) – Member
- Mr. Diwan Singh (Head – Maintenance) - Member

## **9. GUIDELINES FOR COMMUNICATION & IMPLEMENTATION OF THIS POLICY:**

An email ID will be made available. This email ID will be available for reporting of any violation or misconduct. A communication mechanism will be put in place to create awareness about this policy with the existing employees and for new joiners in all units/locations operating in India.

It is the responsibility of the HR Team to ensure that the updated names and email id of the HR Head & Business Unit Head is made available to all employees through the local intranet and/or any other communication mechanism they may adopt.

This policy is equally applicable to Third parties who may wish to report a concern related to a potential violation of the Core Values or the Company Code of Conduct. For any query or clarification on this policy, you may write to the HR department at [hrranco@anbros.com](mailto:hrranco@anbros.com).

## **10. CONFIDENTIALITY:**

The Whistle blower Committee will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.