

## **Bridgestone India Automotive Products Private Limited**

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| <b>Policy Name</b>        | <b>Whistleblower Policy</b> |
| <b>Reference No.</b>      | <b>Fin / 009</b>            |
| <b>Issuing Department</b> | <b>Finance</b>              |
| <b>Enactment Date</b>     | <b>01 Oct 2013</b>          |
| <b>Revision Number</b>    | <b>02</b>                   |
| <b>Revision Date</b>      | <b>1 February 2016</b>      |

### **Whistleblower Policy**

#### **Objective:**

To provide employees, customers and vendors an avenue to raise concerns, in line with BSIA's commitment to the highest standards of ethical, moral and legal business conduct and its commitment to open communication. To provide necessary safeguards for protection of employees from reprisals or victimization, for whistleblowing in good faith.

#### **Scope and Coverage:**

All permanent employees, suppliers and customers of BSIA.

#### **Main features:**

Any employee or customer or vendor (Complainant / Whistleblower) has strong reason and sufficient grounds to believe that actions of some employees of the Company:

- Are not in line with applicable company policy ;
- Are unlawful;
- May lead to misappropriation of company resources; or
- May lead to incorrect financial reporting ;
- Unfair and undue personal advantage;
- Impropriety and financial loss to the Company;
- Otherwise amount to serious improper conduct involving moral turpitude.

should report his/her concern to the Specified Authority. The complaint should be based on reasonable grounds and not hearsay.

***Safeguards to the Whistleblower:***

➤ **Harassment or Victimization:**

The company will not tolerate harassment or victimization of the complainant and it could constitute sufficient grounds for dismissal of the concerned employee who victimizes or harasses the Complainant.

➤ **Confidentiality:**

The confidentiality of the Whistleblower will be maintained. Every effort will be made to protect the complainant's identity, subject to any legal requirements. The Company will not disclose the identity of the whistleblower and will take all steps to safeguard the interest of the whistle blower.

➤ **Anonymous Allegations :**

Complainants must disclose their names while reporting concerns. However Specified Authority may initiate suo-moto action in case of reasonable grounds exist, even if the whistleblower does not reveal his identity.

➤ **Malicious Allegations :**

Malicious allegations by employees against other employees may result in disciplinary action.

**Specified Authority:**

The following persons are the Specified Authority for this purpose.

1. Board of Directors
2. Managing Director
3. Company Secretary
4. Plant Head – Chennai
5. Plant Head – Manesar
6. AGM - HR

## **Reporting:**

The whistleblowing procedure is intended to be used for **serious and sensitive issues**. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported to the Specified Authority. **Annexure I** provide the necessary contact details.

## **Investigation:**

All complaints received will be recorded and analyzed. If the initial enquiries by the Specified Authority indicate that the concern has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision documented.

Where initial enquiries indicate that further investigation is necessary, this will be carried out either by the Specified Authority or by a Committee nominated by them for this purpose. The investigation would be conducted in a fair manner, as a neutral fact finding process and without presumption of guilt. A written report of the findings would be made.

## **Investigation Result:**

Based on a thorough investigation, the committee (or Specified Authority) would recommend an appropriate course of action to the MD of BSIA. The Specified Authority will, in case of any wrong doing, suggest appropriate disciplinary actions as the case may warrant. All discussions would be minuted and the final report prepared.

## **Communication with Complainant:**

The complainant will receive acknowledgement on receipt of the concern. The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from him/her. Subject to legal constraints, s/he will receive information about the outcome of any investigations.

## **Guideline to the Employees/Customers/Vendors for Whistleblowing:**

1. Bring to the attention of the company early, any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient grounds for their concern. Complaint should not be based on hearsay.
2. Avoid anonymity while raising a concern.

3. Co-operate with investigating authorities, maintaining full confidentiality.
  
4. The intent of the policy is to bring genuine and serious issues to the attention of top management and it is not intended for settling scores and vilification. Malicious allegations by employees against each other may attract disciplinary action.
  
5. A complainant has the right to protection and confidentiality. But this does not extend to immunity for complicity in the matters that are the subject of the allegations and investigation.

**Postal Address:**

**Chennai:**

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136, Vaipur 'B' Block, Eraiyur Village , Mathur Post  
Sriperumbudur Taluk , Kanchipuram Dt, Tamil Nadu – 602 105  
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**Manesar:**

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