

## Whistle Blower

Whether it's improving safety, quality and reliability, delivering better service for our customers, or winning their trust and confidence, all of us at BHARTIYA are working hard to ensure that our company is on a solid foundation for the future. Strong performance is critical to our success, but just as important is how we go about achieving results—with honesty and respect, without taking shortcuts, and by operating ethically and with integrity in all that we do.

To help guide and align our behaviors as we make business decisions that impact our daily operations we are governed by a "Whistle Blower" which ensures that any individual has a right to raise their voices in matters pertaining to any misconduct. It supports our continuing commitment to honest and ethical conduct and compliance with both the letter and the spirit of all laws, rules, and regulations, and our company's policies, standards, and procedures.

## **Whistle Blower**

Whistle Blower ensures the right of all Bhartiya employees to raise their voice in any matters related to any malpractices or misconduct; any activity/activities not adhered to, as per the "Code of conduct", "Sexual Harassment" and report such matters to the concerned authorities for necessitating an appropriate action.

## 1.1 Scope

Whistle Blower is a channel to reinforce a robust implementation of the company's code or otherwise, including prevention of sexual harassment. Through this, the company seeks to provide a procedure for all employees to disclose any unethical and improper practice taking place in the company for appropriate action and reporting.

The company provides necessary safeguards to all, for making protected disclosures in good faith in all the areas mentioned in the code.

## 1.2 Guidelines

- The person reporting any malpractice must provide all factual corroborating evidence, as is available and to the extent possible, to enable commencement of an investigation at the earliest, preferably within 30 days of the irregularity or breach of the code noticed by him/her. The information can be provide in writing either through mail or standard post. The information provided shall be on the basis of the direct first-hand experience and not through any secondary and unreliable source such as grapevine, or any other form of informal communication.
- No person are to act on their own in conducting any investigation.
- If the whistle blower chooses to disclose his/her identity to the Ombudsperson, the authenticity of the whistle blower's identity will be established by the Ombudsperson's office before considering the case for the purpose of investigation

- The disclosure of any incident, shall be supported with authentic data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature, or was not genuine, he/she shall be subject to disciplinary action.
- He/she may choose to be anonymous. However, it may sometimes be difficult to carry out the investigation thoroughly in case of the anonymity. Therefore, people are encouraged to disclose their identity when making the disclosure. It shall be the responsibility of the Ombudsperson to keep the identity of the person undisclosed as far as possible.
- No unfair treatment shall be exhibited towards the whistle blower by the virtue of his/her having reported a protected disclosure under this, and the company shall ensure that full protection has been granted to him/her

### **1.3 Procedure – What to Report**

- Any malpractice or misconduct of any nature which an employee feels is detrimental to company's interest including the violation of the company's code of conduct, Business integrity, Sexual Harassment, any fraud, right to intellectual property and data protection.
- It is advised that matters related to interpersonal issues, service conditions, organizational policies etc should be reported through existing channels addressing such concerns. The procedure should be used only for serious violations as stated above.

- Any unethical means to promote the interest of the business by the employee goods or services or while interacting with suppliers, customers and or any government agencies.
- Any employee accepting or giving money, loans, or any such benefit or privilege from customers, suppliers, or any government agency.

## 1.4 How to report

The concern person can email or post the complaint at the below mentioned address:

The Ombudsperson

Plot No: 38, Sector – 44,

Gurgaon

Email: [ombudsperson@bhartiya.com](mailto:ombudsperson@bhartiya.com)

- The person must provide the background, history, reason for the concern, together with names, dates, place and as much information possible.
- Employees are encouraged to express their concerns preferably within 30 calendar days of the irregularity or breach of code of conduct so that timely action can be taken.