



Smarter track Solutions-Safer Mobility

WHISTLE BLOWER POLICY





OBJECTIVE & SCOPE OF WHISTLE BLOWER POLICY

It is indeed with great pleasure and pride, we are introducing this Whistle Blower Policy to Patil Group of Industries.

The company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standard of Quality, professionalism, honesty, integrity and ethical behaviour.

We are committed to developing a culture where it is safe for all employees, direct and indirect workers to raise concerns about any poor or unacceptable practice and any event of misconduct and to ensure 100% compliance on Quality of Product and to create non-compromised Quality environment.

The Whistle Blower Policy is created to provide all employees, direct and indirect workers, an avenue to raise concerns, in line with the organization's commitment to the highest possible standards of ethical, moral, Quality and legal business conduct and its commitment to open communication.

The policy neither releases anyone from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

This policy shall provide necessary safeguards for protection of everyone from reprisals or victimization, for whistle blowing in good faith. It protects each and every person wishing to raise a concern about serious irregularities within the company.

This Policy shall be applicable to all group companies of Patil Group.



FEATURES OF WHISTLE BLOWER POLICY

The Whistle blower policy is intended to cover serious concerns that could have a large impact on the organization, such as actions (actual or suspected) that :

- May lead to incorrect financial reporting including fraud or suspected fraud
- Are not in line with applicable company policy
- Are unlawful or unethical, biased, favoured, imprudent event
- Ignorance of Quality Parameters of Production Process
- Manipulation of the Quality standard readings
- Abuse of authority
- Breach of contract/Employee code of conduct or rules
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records
- Criminal offence
- Pilferation of confidential/proprietary information/technical data
- Wastage/misappropriation of company funds/assets

LIST OF QUALITY CONCERNS

- If the Production is not as per the defined process
- If found manipulation in any of the production processes viz.
 1. Mould cleaning
 2. Tensioning
 3. Vibration
 4. Steam Curing & Water Curing
- Use of bad quality Raw materials (Sand, Cement, Metal, Inserts, etc.)
- Manipulating the readings/adjustment of readings
- Use of bad quality wire rods
- If there is no proper stranding of wires
- SR – Heat Treatment Deviation
- Compliance of Quality Manual – No short circuiting of QC



PROCESS OF WHISTLE BLOWER POLICY

WHISTLE BLOWER (COMPLAINANT)/OMBUDSPERSON :

An employee making a disclosure under this policy is commonly referred to as a Whistle Blower (Complainant) and the person receiving the disclosure is referred to as Ombudsperson.

The ombudsperson may be a Non – Executive Director, or any person including a full time senior employee or may be an outsider, well respected for his/her integrity, independence and fairness. He/she would be authorised by the Statutory board of the company for the purpose of receiving all complaints under this policy and ensuring appropriate action.

The whistle blower's role is as a reporting party, he/she is not an investigator. Although the whistle blower is not expected to prove the truth of an allegation, he/she needs to demonstrate to the Ombudsperson that there are sufficient grounds for concern.

SAFEGUARDS :

1. Harassment or victimisation of the whistle blower will not be tolerated and could constitute sufficient grounds for dismissal of the concerned employee.
2. Confidentiality shall be strictly maintained and every effort will be made to protect the whistle blower's identity.
3. Whistle blower must put their names to allegations as follow-up questions and investigation may not be possible unless the source of information is identified. Concerns expressed anonymously will not be usually investigated but subject to the seriousness of the issue raised, the ombudsperson can initiate an investigation independently.
4. Malicious allegations by employees may result in disciplinary action

The whistle blowing 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 ombudsperson. The necessary format for whistle blowing is provided vide **Annexure - I** enclosed.



Investigation :

All complaints received under this policy shall be recorded and looked into. If initial enquiries by the ombudsperson 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 through either by the ombudsperson alone or by a committee nominated by the ombudsperson 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 covering the following:

1. Facts of the matter
2. Whether the same protected disclosure was raised previously by anyone, and if so, the outcome thereof
3. The finance/otherwise loss which has been incurred/would have been incurred by the Company

Investigation Subject :

The investigation subject is the person/group of persons who are the focus of the enquiry/investigation. Their identity shall be kept confidential to the extent possible.

Investigation Result :

Based on a thorough examination of the findings, the committee or ombudsperson would recommend an appropriate course of action to the Executive Chairman of the Company. Where an improper practice is proved, this would cover suggested disciplinary action, including dismissal, if applicable, as well as preventive measures for the future. All discussions would be minuted and the final report prepared.

The investigation subject is the person/group of persons who are the focus of the enquiry/investigation. Their identity shall be kept confidential to the extent possible.

The ombudsperson will provide quarterly reports to the Executive Chairman.



Communication with Whistle Blower :

The whistle blower will receive acknowledgement from the ombudsperson on receipt of the concern.

The amount of contact between the whistle blower and the ombudsperson/investigating body will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the whistle blower if necessary. Subject to legal constraints, the whistle blower will receive information about the outcome of any investigations.

Changes to Policy :

This policy can be changed, modified, rescinded or abrogated at any time by the statutory body of the organization.

Accountabilities of Whistle Blower :

1. 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.
2. Avoid anonymity when 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 forum and it is not intended for petty complaints. Malicious allegations by employees may attract disciplinary action.
5. A whistle blower has the right to protection from retaliation. But this does not extend to immunity for complicity in the matters that are the subject of the allegations and investigation.
6. In exceptional cases, where the whistle blower is not satisfied with the outcome of the investigation carried out by the ombudsperson, he/she can make a direct appeal to the Executive Chairman.

Accountabilities of Ombudsperson :

1. Ensure that the policy is being implemented
2. Ascertain prima facie – the credibility of the charge. If initial enquiry indicated further investigation is not required, close the issue
3. Documentation of the initial enquiry



4. Where further investigation is indicated, carry this through, appointing a Committee if necessary
5. Provide quarterly reports to the Executive Chairman of the group.
6. Acknowledge the receipt of concern to the whistle blower, thanking him/her for initiative taken in upholding the company's business conduct standards.
7. Ensure that necessary safeguards are provided to the whistle blower.

Responsibilities of Ombudsperson :

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

Investigation Subject :

1. Provide full co-operation to the Investigation team/ombudsperson
2. Be informed of the outcome of the investigation
3. Accept the decision of ombudsperson
4. Maintain strict confidentiality

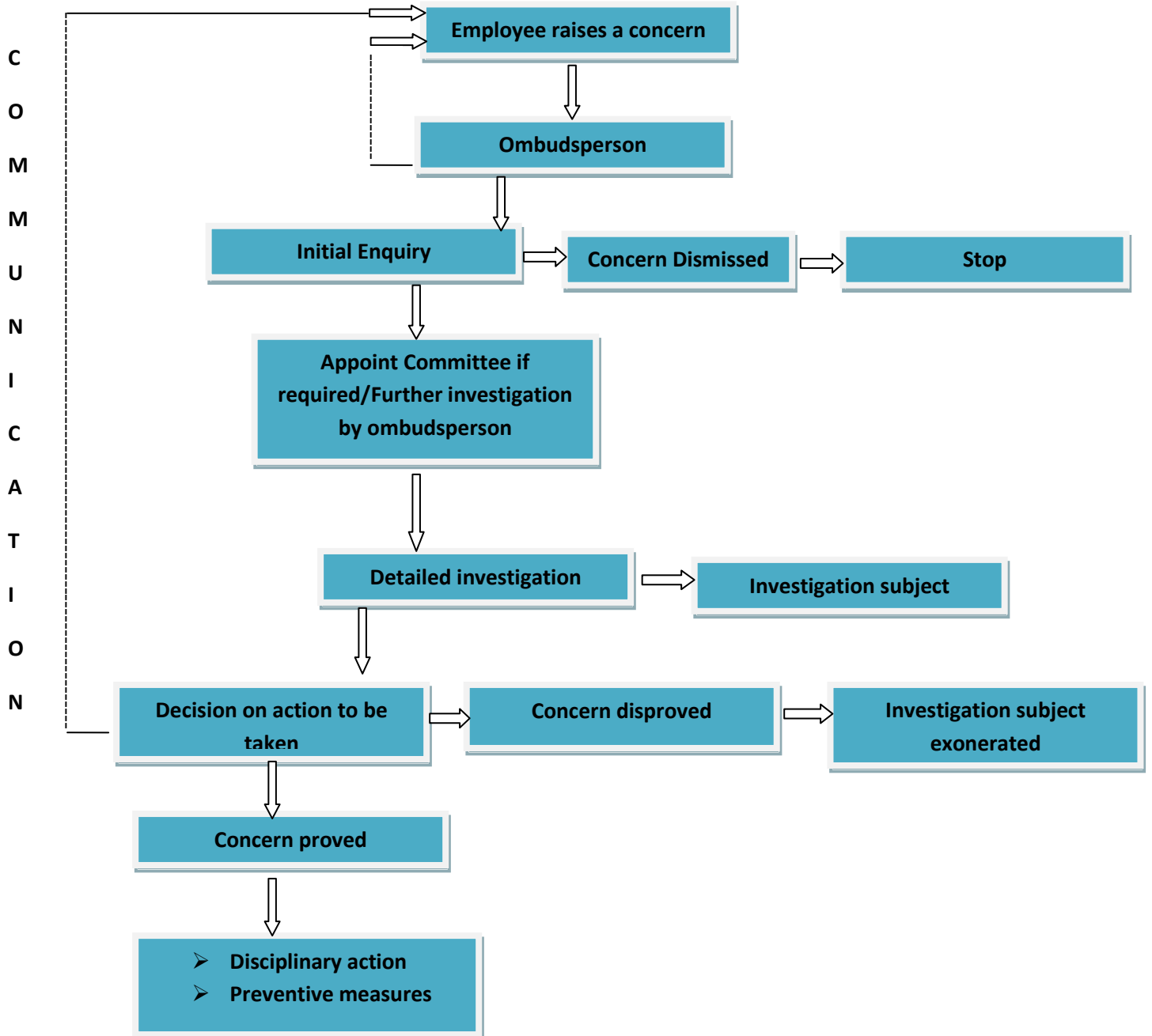
Rewards :

The Whistle blower shall be suitably rewarded if the concern raised is proved or found to be correct, depending on the seriousness of the concern.

Special Award :

We, as an Organization is highly focused towards Quality Product and working continuously towards creating un-compromised quality environment. The action against ignorance of Quality or manipulation in recording the Quality parameters shall be taken very seriously. Any concerns raised related to Quality parameters shall be highly rewarded with a special award.

The process flow of Whistle Blower Policy





ANNEXURE – I

(Format for Whistle Blowing)

Date :
From : (Name of the employee & email id to be communicated)
To : Ombudsperson, pgiwhistle@gmail.com & chairman.pgi@gmail.com
Mobile No : 9866789944
Investigation subject : (Name of the person focused at)

Brief of the concern

Any evidences : (attach evidences if any)

Note : The whistle blowing shall be submitted atleast within 30 days of the occurrence of the concern/event (or) before occurrence