

ISSUED BY	:	Human Resources Department
EFFECTIVE FROM	:	23 rd January, 2012
MANUAL NO.	:	BSID-WBP-01
REVISED ON	:	21 st April, 2014

BSID WHISTLE BLOWER POLICY

1. PURPOSE

The Purpose of this Policy is to provide opportunity to employees to raise concerns in case they observe any unethical and improper practices in the Company with the assurance that they will be protected from reprisals or victimization for whistle blowing in good faith.

2. APPLICABILITY

This policy applies to all permanent employees of the Company including the Directors of the Company.

3. POLICY

This policy is intended to prevent the unethical and improper practices that could have a serious impact on the Company, such as:

- (i) Unlawful acts
- (ii) Incorrect Financial Reporting
- (iii) Falsification, alteration or substitution of the Company's records
- (iv) Money Laundering
- (v) Collusion with Competitors
- (vi) Failure to comply with the various compliance programs of the Company
- (vii) Deliberately failing to report serious breaches of policy, concealing such breaches, or deliberately withholding relevant information concerning a serious breach.
- (viii) An act which does not conform to the Company's Standards or ethical business practices.
- (ix) Activities which otherwise amount to serious improper conduct.

This list is indicative and not intended to be exhaustive.

4. PROCEDURE

(1) Reporting

- (i) Reports of allegations of suspected unethical activities are encouraged to be made in writing so as to assure a clear understanding of the issues. Such reports should be factual and must contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.
- (ii) Concerns should be reported preferably in writing in English or Hindi language so as to ensure a clear understanding of the issues raised.
- (iii) The Report can be submitted in either of the following way:

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- (a) Directly to Vigilance Officer Mr. Ajay Sevekari, Director in writing in sealed envelope delivered by post or personally;
- (b) An email complaint can be send to wbcompliance@bridgestone.co.in

- (iv) Employment-related concerns should continue to be reported through the normal channels as per the Company Policy.
- (v) Whistleblower shall mention his / her Name, Title, Department to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.
- (vi) Whistleblower must retain all documents that could be relevant to an investigation of the matter.
- (vii) Whistleblower is not to act on his / her own in conducting any investigation.
- (viii) All concerns reported will be kept confidential and will be shared only on a 'Need to Know' basis.

(2) Investigation

- (i) Concerns expressed will be explored appropriately, but consideration will be given to seriousness of the issue raised and credibility of the concern.
- (ii) Initial inquiries will be made to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.
- (iii) If the Investigator/s determines that the concerns reported is valid, Investigator/s will investigate the alleged violation.
- (iv) In conducting an investigation, precautions should be taken to safeguard against unfounded, inaccurate or unwarranted accusations
- (v) The need for contact with the whistle blower will depend on the nature of the issue and the clarity of the information provided. Further information may be sought from the whistle blower.

(3) Investigator

The Vigilance Officer will appoint the Investigation Officer(s) / Investigation team to investigate the concerns reported by Whistle blower. Such Officer / Team shall report to the Vigilance Officer.

(4) Investigation Participant

- (i) All employees who are interviewed, asked to provide information or otherwise participate in an investigation have a duty to fully cooperate with the investigators.
- (ii) Participants should refrain from discussing or disclosing the investigation with anyone not connected to the investigation and the investigation subject.
- (iii) Participants shall maintain the confidentiality of the investigation.
- (iv) Participants are entitled to protection from retaliation for having participated in an investigation.

(5) Investigation Subject

- (i) A subject is a person or a group of persons who is the focus of investigative fact finding either by virtue of an allegation made or evidence gathered during the course of an investigation. The decision to conduct an investigation is not an accusation; it is to be treated as a neutral fact finding process.

- (ii) The identity of a subject should be maintained in confidence to the extent possible given the legitimate needs of law and fairness in investigation.
- (iii) Unless there are compelling reasons to the contrary, Subjects should be given fair opportunity to prove / justify his stand, including personal hearing as may be required.
- (iv) Subjects have a responsibility not to interfere with the investigation and to give any kind of threatening, warning to the investigators in this regard.
- (v) Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached or frightened.

(6) Investigation Report

- (i) The Investigator/s or Investigation team, as the case may be will file a report of the findings to the Vigilance Officer along with any supporting evidence.
- (ii) Investigation process shall be completed normally within 4 (Four) weeks from the day of the receipt of complaint, however the period may be extended depending upon the circumstances.
- (iii) The Vigilance Officer will take prompt and appropriate action based on the findings reported by the Investigator/s or Investigation team and depending upon the seriousness of the issue, it may be consulted and/or reported to the Director – in Charge of Operations and the Managing Director of the Company.

(7) Information Report

When possible and when determined appropriate by the Vigilance Officer, the notice of corrective action will be given to the Whistleblower.

5. FALSE ALLEGATION & LEGITIMATE EMPLOYMENT ACTION

- (i) In the event that a complaint made in good faith is subsequently found to be untrue, no action would be initiated against the Whistleblower. However, action will be taken against Whistleblowers making baseless allegations.
- (ii) No adverse personnel action shall be taken or recommended against an employee in retaliation to his/her disclosure in good faith of any unethical and improper practices or alleged wrongful conduct.
- (iii) Every effort will be made to treat the whistle blower's identity with appropriate regard for confidentiality.
- (iv) This Policy does not protect an employee from an adverse action which occurs independent of his/her disclosure of unethical and improper practice or alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this Policy.

6. REVIEW OF POLICY

The HR – Department may make changes to this Policy from time to time to improve the effectiveness of its operation. Any material change should be done with the approval of the Managing Director.