

WHISTLEBLOWER POLICY

Policy Statement

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

The policy expects employees to maintain strict confidentiality in the course of their work. This policy is not a route for taking up interpersonal conflicts/ grievances.

Everyone is required to report to the company any suspected violation of any law that applies to the company and any suspected violation of the company's code of conduct. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations, frauds, misconduct, bribery, or violations of the antiretaliation aspects of this policy and any kind of grievance.

Purpose

This policy aims to provide an avenue for employees to report to the company any suspected violation of any law that applies to the company and any suspected violation of the company's code of conduct.

Scope

Various stakeholders of the company are eligible to make protected disclosures under the policy. These stakeholders may fall into any of the following broad categories:

- Employees of the company (direct and indirect employees)
- Employees of other agencies deployed for the company's activities, whether working from any of the company's offices or any other location
- Any other person having an association with the company
- A person belonging to any of the above-mentioned categories can avail of the channel provided by this policy for raising an issue covered under this policy

Whistleblower Committee

The policy requires a committee to be constituted for the company to deal with such kind of complaints or issues raised by whistleblowers and therefore, it has been decided by the management of the company to constitute a committee under the whistleblower policy.

Following are the Committee members:

1. President (Management Representative)
2. Head - Operations
3. Head - Technical Marketing & Engineering
4. Head - Manufacturing Engineering
5. Functional Head - HR

The Management of FFPL is authorized to add, delete or replace number of members in the Committee under the whistleblower policy.

The Committee under the whistleblower policy of FFPL shall be at liberty to seek legal guidance, wherever they deem fit.

Procedure for Reporting

Disclosure can be made in any one of the following ways:

Disclosure report should include as much information about the suspected violation. Where possible, it should describe the nature of the suspected violation, the identities of persons involved in the suspected violation and the time frame during which the suspected violation occurred.

- a. Online:** Disclosure can be made on MyFFPL page under HR tab
 - The employee can report by submitting a request under the whistleblower tab
 - The employee must provide the required details (e.g. concerned department, type, matter description and attachments if any) before submitting the request
 - After submitting the request, a whistle Id will be created and he/ she will be able to check the status (e.g. submitted, under process and closed)
- b. In writing:** Disclosures can be addressed to the President or any member of the committee.

Letters can be sent by hand-delivery, courier or post to:
President (or any committee member as mentioned above),
136, Park Marina Road,
Off Baner Road, Pune- 411045
Or E-mail: whistleblower@fleetguard-filtrum.com

Resolution

- The whistleblower request raised will go to the Management Representative and HR Manager which will be discussed with the committee members and Inquiry Officer shall be appointed who will further investigate the matter/ issue
- The inquiry officer shall present the findings/ detailed report before the whistleblower committee. Committee members shall take further decision/ action

Amendment

- The whistleblower committee is authorized to make suitable amendments timely in this procedure, which shall be consistent with the provisions of law and principles of natural justice

Confidentiality

- The whistleblower committee shall treat all the complaints in a confidential and sensitive manner; therefore, name of the whistleblower will be kept confidential
- The Policy should not be used in place of the company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues/ cross-functional team members