	BBW GLOBAL TEK PRIVATE LIMITED			ANNEXURE	
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BBW GLOBAL TEK PRIVATE LIMITED

Coimbatore

ETHICS ESCALATION POLICY

(WHISTLE – BLOWING)

INVESTIGATIONS WILL BE CONDUCTED ON CLAIMS


It is BBW's commitment to diligently examine all presumed infringements that are formally notified. Information concerning incoherent performance, with particular reference to product safety, will be examined by the "WHISTLE-BLOWING" committee.

Offenses may include, but are not limited to:

- Criminal acts
- Unlawful financial activity
- Corruption & Bribery
- Failure to comply with legal obligations
- Breach of health and safety regulations
- Product's safety
- Environmental damage
- Information Security concerns
- Child Labour Act as per Indian Constitution (Article 24)
- Labour under 18 years age working on production sites exposed to chemicals, dusts, heat, noise, heavy machinery, hazardous pesticides and related ones..
- Withholding any known unlawful activity
- Discrimination or Harassment Issues in recruitment and training in work-place

All claims will be subject to an investigation that will be conducted by the afore mentioned committee made up of experts completely independent of internal management.

In the event of an incoherent performance or failure to comply with the agreed upon requirements, appropriate corrective action shall be taken

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immediately, irrespective of the level or position of the persons involved. All cases will be managed until a final solution is found.

The WHISTLE-BLOWING COMMITTEE will meet, at least once a year; in order to review all reported claims as well as the relative development and status of the possible activities that have been put in place.

Following the committee’s meeting, a report will be drawn to keep track of the activities.

THE WHISTLE BLOWING COMMITTEE

The Whistle blowing committee is made up of the following members:

- Managing Director of BBW;
- Head - HR;
- General Manager - Operations;

PRIVACY IS FUNDAMENTAL

To file a claim or complaint requirement is to give full name and contact details any further information as the need may be. All information supplied will be shared exclusively with the whistle blowing committee and subsequent persons in charge of verifying the investigations and putting in place the corrective actions.


All activities will be carried out in such a way as to ensure anonymity.

Such requests may be made by but are not limited to the following examples:

- Law-enforcement officer;
- A member of the court;
- Any other person or organization to which we are forced, by law, to supply said information;
- It must be recognized that a person making a claim may be identified by others due to the nature or circumstances of the dissemination of the information.

HOW TO MAKE A CLAIM

Everyone has the right to make a claim. Claims can be made by filling out the form on this page. The website guarantees the privacy of the information submitted and notifies, by e-mail, exclusively the members of the WHISTLE-BLOWING COMMITTEE. The information provided will not be kept on file.

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WHISTLE-BLOWING COMMITTEE complain email id is easwar@bharatweights.com and 24x7 phone number is 7708248812.

CLAIMER'S PROTECTION

The employee that, in good will, reports unlawful conduct will be safeguarded from detrimental consequences with regard to disciplinary procedures and will be protected against the possible adoption of "discriminatory measures, either direct or indirect, having effect on the working conditions for reasons connected either directly or indirectly to the complaint".

The contents of the claim must remain confidential throughout the management of the claim, including of requirements made during legal hearings.

Should the accusation, that generated the disciplinary action, be based exclusively on the report filed by the employee, the accused may have access to the identity of the claimer, even if the latter has not given their permission to do so. This situation may arise if and only if it becomes an "absolute necessity" to defend itself as required.


With the exclusion of cases in which may result in slander or defamation according to the penal code and the assumptions in which the anonymity is not enforceable by law, the identity of the claimer is, therefore, protected in every aspect following the claim and may not be revealed without their permission supplied in writing.

Any employee making a claim in line with this procedure will not be subjected to any form of direct or indirect retaliation or discrimination for reasons related either directly or indirectly to said claim.

Should an employee be of the opinion that they have experienced discrimination for having made a claim, they must supply specific details of the events to the committee, to allow the committee to evaluate the validity and the possible actions and/or procedures to be put in place.

CLAIMER'S RESPONSIBILITY

The claimer's safeguard cannot be assured and it remains their responsibility in case the claim constitutes an assumption of slander and defamation, in accordance with the penal code, or an unlawful act

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Following the investigation should the claim results to be unsubstantiated and submitted with the purpose to obtain a personal advantage or with sole scope of damaging the accused or other subjects, disciplinary action will be taken into consideration and any expenses incurred will be charged to the claimer.

10/4/2023



Managing Director