

# ABC BEARINGS LIMITED

## WHISTLE BLOWER POLICY

ABC Bearings Limited's (ABC) Business Principles set high standards of conduct for its employees, contractors and suppliers. The Company believes that it is crucial that these principles be followed in order to ensure business success.

### 1. Purpose, Scope and Guiding Principles:

ABC wants to know about any breach or potential breach of its Business Principles, unlawful conduct, financial malpractice or dangers to the public, the environment, or to anyone working for ABC, that may be occurring despite the rigorous compliance procedures of the Company. ABC's employees therefore have a duty to inform promptly if they have any reason to suspect that there has been a breach or potential breach of the Business Principles or any other misconduct. If an issue is raised internally first, and acted upon, it is likely to reduce any damage that may otherwise occur. Reporting of issues will detect and possibly deter any further wrongdoing.

The Policy explains how employees and any other individual or organization should report their concerns, the types of issues that are covered by the Policy and guidance on how individuals can seek assistance when they have a concern.

ABC will not tolerate retaliation against any employee who in good faith seeks advice, raises a concern or reports misconduct.

Responsibility for investigating concerns raised under this Policy rests with the Fraud Investigation Officer, who reports to the Audit Committee for this purpose. The Audit Committee has responsibility for keeping the Policy under review and amending it as necessary.

All concerns raised under the Policy will be monitored to ensure that the Company takes appropriate action to redress any issues.

### 2. Scope:

The Whistle Blower Policy applies to all employees of ABC and any employees working for entities and third parties such as contractors and agency workers.

The duty to report concerns applies to all employees of ABC. To fulfill this duty, employees must provide as much information as possible to ensure that a proper investigation can be carried out and must respond to requests for further information as the investigation progresses.

Depending on the terms of their contracts, employees working for entities and third parties such as contractors and agency workers may also have a duty to report concerns under this Policy. Where there is no such contractual obligation, third party workers are encouraged to use this Policy and bring their concerns about ABC or anyone acting on our behalf to our attention.

Any other individual or organization such as supplier or family member can also use this Policy to report concerns regarding the conduct of ABC or anyone action on our behalf. Such openness can help information reach the management which may otherwise go unnoticed, for example bribery or exploitation of gifts and hospitality.



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Details of this Policy can be found on the ABC website.

3. Raising concerns – where to go for help:

If fraud is suspected an intimation can be sent to the Managing Director. His contact details are:

Mr. Pradip M. Patel  
Managing Director  
Phone: 24964500  
E-mail: [patelpm@abcbearings.com](mailto:patelpm@abcbearings.com)

4. Access to the Audit Committee:

In the extra-ordinary circumstances where a person feels that he/she is not able to communicate his/her concern to the Managing Director, he/she has the option to address his/her concern to the Chairman of ABC's Audit Committee. His contact details are:

Mr. Jal R. Patel  
Chairman-ABC Bearings Ltd. Audit Committee and Independent Director  
Address: ABC Bearings Limited  
Mr. Jal R. Patel  
Flat No. 33, Vaikunth,  
Behind Deepak Foundation,  
Gotri Road,  
Vadodara – 390021

5. Anonymous E-mail:

Any anonymous E-mail will not be entertained. Strict action will be taken against any person found guilty of sending anonymous E-mail.

Persons other than employees can access the following link using Internet Explorer browser:

For employees	
For others	Visit our website Section Corporate Governance/Blow Whistle Online

The site would display the following options:

For e-mail to the Managing Director

For e-mail to the Chairman of the Audit Committee

The whistler needs to choose any one of the options by clicking on the link.

This would generate an anonymous e-mail as shown at the end of the policy documents. Details of malpractice(s) observed are to be filled in. E-mail address is to be given if feedback is desired.

6. Format of e-mail:

Blow a Whistle

E-mail to the Managing Director

To,

The Managing Director

ABC Bearings Limited

Subject: ..... (e.g. complaint, grievance, feedback, etc.)



ABC BEARINGS LIMITED

Enter message ..... (upto 500 characters)

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Do you want a feedback? (please replace whistler@abcbearings.com with your email ID)

whistler@abcbearings.com

Send

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E-mail to the Chairman of the Audit Committee

To,  
The Chairman  
Audit Committee  
ABC Bearings Limited

Subject: ..... (e.g. complaint, grievance, feedback, etc.)

Enter message ..... (upto 500 characters)

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Do you want a feedback? (please replace whistler@abcbearings.com with your email ID)

whistler@abcbearings.com

Send

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Reviewed and Approved by the Audit Committee Meeting and the Board of Directors  
Meeting held on 24<sup>th</sup> May, 2017

For ABC Bearings Limited



S.B. Desai

Company Secretary

Date: 24<sup>th</sup> May, 2017

Place: Mumbai