Steel Strips Wheels Limited

Whistle Blower Policy

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Classification: Internal

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Document Control

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1. Purpose

The purpose of this policy and procedure is to outline ways in which all employees can express concerns about malpractice/wrong doing and to encourage employees to raise these at an early stage

2. Scope

This policy applies to all staff who works for Steel Strips Wheels Limited whether full-time or part-time, self-employed, employed through an agency, as a volunteer or as a contractor or retainer.

Company is committed to managing the organisation in the best way possible. This policy is in place to reassure staff that it is safe and acceptable to speak up and enable concerns to be raised at an early stage and in the right way. Rather than wait for proof. We would prefer you to raise the matter when it is still a concern. It can be difficult to know what to do when these concerns are about unlawful conduct, financial irregularities, abuse of patients, dangers to the employees, public or environment, health and safety issues, or if you feel these issues are being inappropriately concealed.

This policy is to be applied consistently and in line with Code of conduct.

2.1 Exclusions

This policy does not apply to complaints about employment or how you have been treated. For cases such as this, the Grievance Procedure should be used. There are also a range of policies and procedures that are covered under "Code of Conduct", such as bribery, fraud and corruption, recruitment/selection & other policies e.g. health and safety polices and procedure and staff are advised to refer to these when considering a disclosure under this policy.

3. Definitions

a. **Whistle blowing:** The official name for Whistle blowing is 'making a disclosure in the public interest'. It means that if you believe there is wrong doing in your workplace, you can report this by following the correct processes and your employment rights are protected.

b. **Malpractice:** could be improper, illegal or negligent behaviour by anyone in the workplace.

4. Aims and Objectives

The 'Whistle Blowing Policy is intended to cover serious public interest concerns that fall outside the scope of other procedures. These, as stated in the Act are that in the reasonable belief of the employee, the following matters are either happening now, have happened, or are likely to happen:

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a) A criminal offence
b) The breach of a legal obligation
c) A miscarriage of justice
d) A danger to the health and safety of an individual
e) Damage to the environment
f) Deliberate covering up of/failing to report information tending to show any of the above matters.

5. Whistle Blowing Procedure

5.1. How to raise a concern?

If Employee is unsure about raising his/her concern at any stage he/she can get independent advice from your HOD, HR Head, and Quality Head or he/she can directly write a mail to whistleblower@sswlindia.com. However, grievance handling Manager does ask that concern employee to explain as full as he/she can elaborate the information or circumstances that gave raise to his/her concern.

5.2. Internal Stages

Once you have reported your concern to HOD or P&A Head. This may be done verbally or in writing. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them and what further assistance we may need from you.

When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, harassment or other relevant procedure, we will inform you accordingly.

Managers must help to create a climate where staff feels able to talk in confidence without the threat of disciplinary action being taken against them. The manager will identify the nature of the issue by undertaking a preliminary investigation.

If the investigation and any resultant action do not resolve the matter, or if a concern involves the immediate line manager, the member of staff should raise the concerns with head P&A. P&A head will arrange an initial interview which will, if requested, be confidential to ascertain the areas of concern. At this stage, you will be asked whether you wish your identity to be disclosed and will be reassured

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about protection from possible victimisation. You will also be asked if you wish to make a written statement. In either case, the designated officer will write a brief summary of the interview, which will be agreed by both parties

The designated officer will report to the Head P&A or if required than will report to, Quality Head and plant head who will be responsible for any further action

5.3. The Formal Investigation

If the concern raised is very serious or complex, a formal investigation may be held. The investigation may need to be carried out under the terms of strict confidentiality i e, by not informing the subject of the complaint until it becomes necessary to do so. In certain cases, however, such as allegations of ill-treatment of Employee/clients, suspension from work may have to be considered immediately. Protection of Employee/clients is paramount in all cases.

The designated officer will offer to keep the member of staff informed about the investigation and its outcome.

If the result of the investigation is that there is a case to be answered by any individual, the Plant's Disciplinary Policy will be used and the details discovered by the formal investigation, transferred to that process.

Where there is no case to answer, but the employee held a genuine concern and was not acting maliciously, the P&A Head will ensure that the employee suffers no reprisal.

If there is no case to answer but there is evidence that the allegation was made frivolously, maliciously or for personal gain, disciplinary action will be taken against the complainant.

The matter will be dealt with promptly at each stage. Where appropriate, Immediate steps will be taken to remedy the situation as soon as practicably possible. A final outcome may take more time but a final resolution/outcome at each stage should be available within ten working days.

However, disclosure may attract statutory protection from victimisation/other detriment where all of the following apply:

a) They have an honest and reasonable suspicion that the malpractice/wrongdoing has occurred, is occurring, or is likely to occur,
b) They honestly and reasonably believe that the information and any allegation contained in it are substantially true;

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c) The disclosure has not been made for personal gain;

d) The matter was exceptionally serious.

6. Training Requirements:

There are no mandatory training requirements associated with this Policy. However, training on the implementation of this frameworks available from the P&A Consultancy department.

7. Monitoring and Compliance:

This policy shall be reviewed by the Head of P&A

The Head of P&A is responsible for collating details of any cases which are dealt with under this procedure and will provide an aggregated report to the Plant head on an annual basis. The latter report will outline the nature of the concern and the outcome in a form that does not endanger the employee's confidentiality.

The Whistle Blowing Policy covers the following: -

a) conduct which is an offence or a breach of law, e.g. fraud, corruption or theft
b) disclosures related to miscarriages of justice
c) health and safety risks, including risks to patients/visitors as well as other employees
d) damage to the environment, e.g. green issues
e) Verbal, sexual or physical abuse of patients, or other unethical conduct/behaviour
f) discrimination on grounds of sex, race or disability or religion
g) poor clinical practice
h) malpractice
i) professional misconduct
j) nepotism

Prepared By:	**Approved By:**
Lead PM & Strategy	**General Manager**

STEEL STRIPS WHEELS LTD. Chandigarh

** End of Document**

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