



Whistle Blower Policy

Abilities India Pistons & Rings Ltd

GT Road Giani Border Post-Chikamberpur, Ghaziabad UP-201006

POLICY INFORMATION

Document No.	Issue No. & Date	Implementation Date	Communicated To
POLICY/ AIP/034	01 (01.07.2025)	01.07.2025	All Stakeholders, All employees Supplier and Contractors etc

REVISION HISTORY INFORMATION

4.			
3.			
2.			
1.	01.07.2025		New Release
Issue No.	Issue Date	Amendment History	

Proposed By	Approved By
CONTROLLED COPY, DATE- 01.07.2025	
HRD	Managing Director

TITLE: - Whistle Blower Policy

1. Purpose

The purpose of this Policy is to articulate the Company’s approach towards whistleblowing and to strengthen the mechanism at AIP. This Policy provides a platform for employees, directors, and stakeholders to report genuine concerns regarding unethical behavior, misconduct, or violations without fear of retaliation.

The Policy aims to:

- Promote a culture of transparency, accountability, and integrity
- Provide a safe and secure environment for raising concerns
- Enable employees and directors to report suspected violations of applicable laws and the AIP Code of Conduct

2. Scope

This Policy applies to:

- All employees of AIP
- Directors
- All stakeholders associated with AIP

The Policy is aligned with the provisions of the *Whistle Blowers Protection Act, 2014* (India), which provides a framework to report corruption, misuse of power, and other misconduct, while ensuring protection to whistleblowers.

3. Who is a Whistle Blower?

A whistleblower is any employee or stakeholder who:

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- Reports or discloses information
- Provides evidence of unethical behavior such as bribery, misconduct, fraud, or violation of the AIP core values and Code of Conduct

Such disclosure should be made in good faith, based on reasonable belief and after due consideration.

4. Reporting Procedure

A whistleblower may report concerns through any of the following channels:

A Reporting Channels

- Written communication (letter or documented complaint)
- Email :
- Telephone : Enache number

Reports may be addressed to:

- Managing Director (MD)
- Joint Managing Director (JMD)
- Directors
- Vigil Officer

Email: vigil@aippistons.net

All complaints should preferably include sufficient details and supporting evidence to enable proper investigation.

B. Anonymous Complaints

- Anonymous complaints will be accepted if supported by credible information and evidence
- However, anonymous complaints with insufficient details may not be investigated

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C. Information to be Provided

To facilitate effective investigation, the complaint should include:

- Nature of concern (fraud, misconduct, harassment, etc.)
 - Names of individuals involved
 - Date, time, and location of incident(s)
 - Supporting documents or evidence (if available)
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D. Acknowledgement & Timeline

- Acknowledgement of complaint: Within 3–5 working days
 - Preliminary review: Within 7–10 working days
 - Detailed investigation: Within 30–45 days (depending on complexity)
 - Closure communication: Within 7 days of decision
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5. Protection of Whistle Blower

AIP is committed to protecting whistleblowers against any form of retaliation.

The Company shall ensure:

- That disclosures made in good faith are treated seriously
- Identity of the whistleblower will be kept strictly confidential, to the extent possible
- Company shall Protect the employee from victimization, harassment, or unfair treatment
- Information will be disclosed strictly on a need-to-know basis during investigation
- Breach of confidentiality will attract disciplinary action

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6. Investigation & Decision

- All reported concerns will be investigated promptly and thoroughly within a defined timeframe.
- The investigation will be conducted by a committee constituted by top management.
- Any individual with a conflict of interest in the matter will be excluded from the investigation process.
- Findings will be reported to top management for appropriate decision-making.

7. Disciplinary Action

The Company may initiate the following disciplinary actions in case of violation of this Code or any Company policy:

(1) Verbal Warning

The manager/supervisor shall inform the employee that their conduct or performance is unacceptable and advise them to take corrective action.

(2) Written Warning

A formal warning letter shall be issued to the concerned employee detailing:

- Specific violations or performance concerns
- Required corrective actions
- Consequences of non-compliance or recurrence

(3) Suspension

The employee may be suspended for a specified period, without compensation, if their conduct or performance is found to be unsatisfactory or in serious breach of Company policies.

(4) Termination

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In cases of gross misconduct or severe violation of the Code, the employee’s services may be terminated with immediate effect, in accordance with applicable laws.

(5) Action Against False or Malicious Complaints

If a complaint is found to be false and made with malicious intent, the complainant may be subject to disciplinary action in accordance with the provisions outlined above. However, lack of sufficient evidence shall not, by itself, be considered as malicious intent

8. ESCALATION MATRIX

To ensure no concern is suppressed or ignored, the following escalation hierarchy will apply:

Level	Authority	When to Escalate
Level 1	Vigil Officer	Default reporting authority for all complaints
Level 2	Managing Director (MD) / Joint Managing Director (JMD)	If no response within defined timeline or dissatisfaction with initial handling
Level 3	Board of Directors / Audit Committee	If concern involves senior management or remains unresolved
Level 4	External Authority (if required)	In case of legal violations, regulatory breaches, or failure of internal resolution

Special Escalation Cases

- Against Vigil Officer → Report directly to MD / JMD
- Against MD / JMD → Escalate to Board of Directors / Audit Committee
- Against Board Members → Escalate to external regulatory authorities as per applicable laws

9. Tracking & Closure

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- Each complaint will be assigned a unique reference number
- Status tracking will be maintained by the Vigil Officer
- Final closure will be documented with:
 - Investigation findings
 - Action taken
 - Closure date

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