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|-----------------------------------------------------------------------------------|---------------------------------------|--------------------|-----------------|-------------------|---------------------|
|  | <b>BBW GLOBAL TEK PRIVATE LIMITED</b> |                    |                 | <b>ANNEXURE</b>   |                     |
|                                                                                   | <b>APPROVED BY</b>                    | <b>DOCUMENT NO</b> | <b>ISSUE NO</b> | <b>ISSUE DATE</b> | <b>REVISION NO.</b> |
|                                                                                   | <b>MD</b>                             | <b>BBW/ANX/77</b>  | <b>00</b>       | <b>01/07/2025</b> | <b>01</b>           |

## WHISTLE BLOWER POLICY & PROCEDURE

### 1. Objective

BBW is committed to upholding the highest standards of ethics, integrity, and transparency. This Whistleblower Policy is designed to provide a secure and confidential platform for stakeholders to report any unethical conduct or violations without fear of retaliation.

### 2. Scope

This policy applies to:

- Internal stakeholders: Regular/non-regular employees, in-house suppliers, service providers, consultants, and interns.
- External stakeholders: Suppliers, indirect suppliers, vendors, agents, partners, contractors, and local community members.

### 3. Reportable Offenses

- Accepting gifts, entertainment, bribes, or inducements
- Business favours, capital participation, overboarding
- Solicitation and unjustifiable demands
- Theft, embezzlement, and misappropriation of funds
- Leaking confidential or internal information
- Document manipulation or fraudulent reporting
- Anti-competitive behavior (collusion, dumping, abuse of market dominance)
- Sexual abuse, harassment, discrimination
- Money laundering and financial misconduct
- Other violations of BBW's Code of Conduct or ethical norms

### 4. Reporting Channels

Reports can be submitted via the following confidential channels:

- Email: arthigans12@gmail.com
- Phone/WhatsApp: +91 98415 96657 (Mrs. Arthi – Compliance Officer)
- Physical Complaint Box: Installed at reception and HR departments in all BBW facilities
- Online Reporting Portal: <http://www.bharatweights.com/kpi.php>

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Note: Anonymous reports are accepted. Whistleblowers are encouraged to provide as much detail and evidence as possible.

## 5. Whistleblower Protection

- Full confidentiality of the whistleblower's identity
- No retaliation against whistleblowers acting in good faith
- Disciplinary action against individuals who retaliate against whistleblowers

## 6. Investigation & Resolution Process

- Acknowledgement: Complaint acknowledged within 3 business days
- Preliminary Review: Conducted by the Internal Complaint Committee (ICC) within 7 days
- Investigation: If valid, the matter is fully investigated
- Corrective Action: Disciplinary and preventive action taken as necessary
- Closure: Whistleblower (if identified) is informed of the resolution status

## 7. Internal Complaint Committee (ICC)

| Name               | Designation        | Role            | Contact Information                          |
|--------------------|--------------------|-----------------|----------------------------------------------|
| Mrs. Arthi         | Compliance Officer | Chairperson     | arthigans12@gmail.com   +91 98415 96657      |
| Mr. Easwar         | VP – HR            | Member          | easwar@bbwglobaltek.in                       |
| Mr. Satheesh Kumar | Plant Head         | Member          | satheesh@bharatweights.com   +91 97109 33046 |
| Mr. Marimuthu      | Legal Advisor      | External Member | marimuthusvk7@gmail.com   +91 97874 80556    |

## 8. Provision for External Stakeholders

BBW encourages external stakeholders (e.g., suppliers, contractors, indirect suppliers, and local communities) to report any unethical practices affecting them or the organization.

- Phone/WhatsApp: +91 98415 96657
- Email: arthigans12@gmail.com
- Online Portal: <http://www.bharatweights.com/kpi.php>
- Postal Mail:
  - Compliance Officer
  - BBW

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SF NO 322/1A3, Moperipalayam Road  
 Thanneer Pandal, Karumathampatti  
 VIG BBW Road, Near Annalakshmi Gardens  
 Coimbatore – 641659

## 9. Supporting Documentation

- Photographs of on-site complaint boxes
- Screenshots and live links to the web-based reporting system
- Internal ethics and whistleblower awareness training records

## 10. Review and Update

This policy is reviewed annually or upon major legal or operational changes to ensure effectiveness and relevance.



**01/07/2025**

**Managing Director**