



Whistle Blower Policy

Anand NVH Products Pvt Limited

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Reviewed By:	Anju Tyagi, Head -Sustainability
Approved By:	Krishnan Iyer, COO

Anand NVH Products Private Limited, Whistleblower Policy

Anand NVH Products Private Limited is committed to the highest standards of ethical conduct, transparency, and accountability in all business operations.

This Whistleblower Policy establishes a confidential and secure mechanism for employees, directors, suppliers, customers, and stakeholders to report genuine concerns about actual or suspected violations of the Anand NVH Code of Conduct, laws, regulations, or unethical practices—including bribery, corruption, financial misconduct, human rights violations, data breaches, anti-competitive behaviours, and safety issues—without fear of retaliation.

The Company guarantees complete protection for good-faith whistleblowers against discrimination, harassment, or adverse action, with thorough, impartial investigations overseen by the Audit Committee and Ethics Counsellors. Reports can be made anonymously via designated channels (Member Secretary Audit Committee, Ethics Counsellors, or Executive Director), ensuring compliance with Section 177(9) of the Companies Act, 2013 and IATF 16949:2016 Clause 5.1.1.1.

Approved By:



Mr Kanwardeep Singh Anand

Executive Director,

Dated: 15.01.2025

1. PREFACE

Anand NVH Products Private Limited ("the Company") conducts its business with fairness, transparency, and the highest standards of professionalism, honesty, integrity, and ethical behaviour. The Company has established the Anand NVH Code of Conduct ("the Code"), which governs actions of the Company, its employees, directors, customers, suppliers, and stakeholders. Stakeholders play a vital role in identifying violations of the Code.

Raising Concerns

Employees, customers, suppliers, and stakeholders are encouraged to report actual or potential violations of the Code, policies, laws, or misconduct inconsistent with Company values, including bribery, corruption, financial irregularities, and unfair practices. This includes concerns specifically related to bribery, kickbacks, corruption, financial misconduct, and violations of fair business practices.

Reporting Channels

- Line manager or Human Resources department
- Designated Ethics Counsellors

Retaliation against good-faith reporters is strictly prohibited and subject to disciplinary action. Suspected retaliation should be reported immediately to line manager, Ethics Counsellor, HR, or Executive Director.

Section 177(9) of the Companies Act, 2013 (read with Rule 7 of Companies (Meetings of Board and its Powers) Rules, 2014) mandates vigil mechanisms for listed companies, those accepting public deposits, or borrowing over ₹50 crores from banks/public financial institutions. IATF 16949:2016 Clause 5.1.1.1 requires a defined Whistleblower Policy. This Policy provides a confidential mechanism for directors, employees, and stakeholders to report concerns to the Ethics Counsellor or Audit Committee Member Secretary, covering corruption, data breaches, anti-competitive practices, and more.

2. Definitions

The definitions of some of the key terms used in this Policy are given below. Capitalized terms not defined herein shall have the meaning assigned to them under the Code.

"Audit Committee" means the Audit Committee comprising MR, Head Operations, Head Finance and Head HR. MR is the Member secretary for this committee. Individual member of audit committee acts as Ethics Counselor also.

"Employee" means every employee of the Company (whether working in India or abroad), including the directors in the employment of the Company.

"Code" means the Anand NVH Code of Conduct.

"Investigators" mean those persons authorized, appointed, consulted or approached by the Ethics counsellor if the Company and the police.

"Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

"Subject" means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.

"Whistleblower" means an employee or director making a Protected Disclosure under this Policy.

3. SCOPE AND COVERAGE OF THE POLICY

This Policy extends the Code. Whistleblowers report information but do not investigate or decide actions. They must not conduct independent probes unless authorized. Applies globally to employees, directors, and third-party stakeholders.

Illustrative Covered Issues (non-exhaustive):

Financial Misconduct

- Kickbacks, bribery, corruption
- False expenses, financial fraud
- Insider trading, asset misappropriation
- Money laundering, unlawful gifts/bribes

Human Rights & Workplace

- Child labour, human rights violations
- Discrimination, harassment (including sexual)
- Conflicts of interest, concurrent employment

Data & Competition

- Confidential information misuse, data breaches
- Anti-competitive practices (price-fixing, bid rigging)

Safety & Environment

- Environmental/health/safety breaches

4. ELIGIBILITY

Employees, directors, suppliers, customers, and third parties may report Company-related concerns, including bribery/corruption suspicions their location.

5. DISQUALIFICATIONS

- Policy protection excludes knowing false/malicious reports, subject to discipline.
- Three+ frivolous/mala fide disclosures disqualify further reporting and may trigger action.

6. PROCEDURE

- Financial/accounting matters: To Audit Committee Member Secretary.
- Ethics Counsellor/senior (GM+) matters: To Executive Director.
- Others: To any Ethics Counsellor (forwards to Member Secretary).

Role	Name	Address	Dedicated 24/7 Help Line and email id
Member Secretary, Audit Committee	Mr Krishnan Iyer	Anand NVH Products (P) Ltd.39th KM Stone, NH - 8, Begumpur Khatola Industrial Area, Sector-35, Gurgaon - 122 001, Haryana, India +91 124-4030580	9818558139
Ethics Counsellor Head-HR	Mr Narendra Yadav		hr@anandnvh.com
Ethics Counsellor CFO	Mr Arun Sareen		

Reports preferred in writing (English/Hindi, legible), factual/specific. Identity optional; anonymous accepted but may limit follow-up/protection. Forwarded disclosures strip identifiers for confidentiality.

7. Investigation

Ethics Counsellor/Member Secretary investigates under Audit Committee oversight (conflicted members recuse). Neutral fact-finding; may appoint investigators. Subjects informed, allowed response/consult counsel (own cost), must cooperate/non-interfere. Completed ideally within 45 days. Outcomes communicated; unfounded claims not upheld without evidence.

8. Protection

No retaliation/discrimination against good-faith Whistleblowers (e.g., threats, demotion). Company supports during proceedings. Identity confidential per law; assistants protected equally. Violations reported to Member Secretary.

9. Investigators

Independent, objective, ethical; authorized by Ethics Counsellor/Committee. Launch only if allegation specific and unethical.

10. Decision

Confirmed violations prompt Ethics Counsellor/Member Secretary recommendations for discipline/corrective action per Company procedures.

11. Reporting

Ethics Counsellor reports regularly to Member Secretary on disclosures/investigations.

12. Communication Method

Anand NVH conducts regular training and awareness sessions to strengthen understanding of Whistle Blower, Anti Bribery, Business Ethics and Code of Conduct across all levels. Training modules are integrated into the Annual Training Calendar and cover employees, contract workers, and suppliers as applicable.

13. Policy Review and Updates

- **Annual Review:** Comprehensive policy effectiveness review
- **Triggered Reviews:** Reviews following significant incidents or changes
- **Regulatory Updates:** Updates following regulatory changes
- **Stakeholder Input:** Regular stakeholder feedback integration
- **Continuous Improvement:** Ongoing policy refinement

14. Retention

Documents retained minimum 7 years.

15. Related documents and references

15.1 Company Policies:

- Code of Business Conduct and Ethics
- Human Rights Policy
- Diversity, Equity, and Inclusion Policy
- Social Dialogue Policy
- Antibribery Policy
- Business Ethics Policy

Anand NVH Products (P) Ltd.

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Begumpur Khatola Industrial Area,

Sector-35, Gurgaon - 122 001,

Haryana, India

Pone: +91 124- 4030580

Email: esg@anandnvh.co

MANAGEMENT COMMITMENT STATEMENT

The leadership of Anand NVH Products Pvt. Ltd. is wholly committed to fostering robust "Whistle Blower Policy" by providing the required resources, guidance, and support to ensure its effective implementation, continuous enhancement, and meaningful engagement with all employees and stakeholders.



Mr Krishnan Iyer

Chief Operating Officer

Date: 15.08.2025



Mr Narendra Yadav

Head-HR

Date: 15.08.2025



Ms Anju Tyagi

Head-Sustainability

Date: 15.08.2025