



Whistle Blower Policy / Vigil Mechanism



Human Resources

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Version: 2.0

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17 March 2026

Internal

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Internal

ORGANIZATION AREA	DOCUMENT TYPE	VERSION
HUMAN RESOURCES	WHISTLE BLOWER POLICY / VIGIL MECHANISM	VERSION 2.0

Version 1.0 Approved by the Board of Directors on **23 January 2024**.

Version 2.0 Reviewed and Approved by the Board of Directors on **17 March 2026**.



Whistle Blower Policy / Vigil Mechanism

Many violations do not affect an individual directly but are detrimental to the organisation's interest. Individuals hesitate to report such violations out of fear or indifference. The Whistle Blower's policy / Vigil Mechanism provides a mechanism for an individual to report violations without fear of victimisation.

When the director, employee, trainee, contract worker sees violations of integrity norms, he/she may not be directly aggrieved, but may have information that organisational interests are being compromised. This may be unethical behavior, suspected or actual fraud, violation of the Code of Conduct, violation of Occupational Safety, Health and Environment norms etc.

Some examples are accepting/ returning favour in lieu of financial benefits or otherwise, persons taking bribes, confidential information being leaked out, misuse of company's resources, favours shown or demanded from business associates/partners, violation of statutory requirements, unsafe work conditions/practices, discharge of hazardous waste/effluent etc.

Before reporting such events, the complainant has to ascertain that a violation has actually occurred and that the act is not based on what can be termed as a normal business decision.

In all such cases, the complainant will address the complaint to any member of the Enforcement Committee along with the available details and evidence to the extent possible. In case, the complaint is received by a person, other than an enforcement committee member, the same will be forwarded by him to the enforcement committee.

As a rule, anonymous complaints will not be entertained, except in cases, where the complaint is accompanied by strong evidence and data.

The identity of the complainant will be protected and will be known only to the Enforcement Committee.

The Enforcement Committee may meet the complainant, if necessary. They may also appoint any suitable person or group of persons to investigate the case but will ensure that the identity of the complainant is protected.

Whistle Blower will be protected from any kind of discrimination, harassment, victimisation, or any other unfair employment practice.

The Enforcement Committee will decide the case and recommend action within four weeks to the Managing Director / Chairman. The final action to be taken will be decided by the Managing Director / Chairman.

The analysis of the case and the action to be taken may not be communicated to the original complainant.

The director in all cases & employee in appropriate or exceptional cases will have direct access with the Chairman of the Audit Committee.

Enforcement Committee will consist of:

- (a) Shri Rakesh Sharma - Chairman
- (b) Shri Ravi Kyran Ramasamy
- (c) Shri Kevin P D'Sa



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The Enforcement Committee will report to the Chairman. Any grievance against any member of the Enforcement Committee should be addressed to the Chairman of Bajaj Auto Credit Ltd. Organization has created following channels for a Person(s) to raise a concern:

- Person(s) can write an email to whistleblower@bajajautocredit.com
- Person(s) can use the 'Confidential Feedback Mechanism' to share their inputs anonymously by writing to confidentialfeedback@bajajautocredit.com

Place: Pune

Date: 17 March 2026

**RAJIV BAJAJ
CHAIRMAN**
