

HINOPAK MOTORS LIMITED

NAME OF SYSTEM:

Hinopak Whistle Blowing System

OBJECTIVE

- Support company's values in line with its commitment to the highest possible standards of ethical, moral and legal business conduct and its pledge to open and candid communication.
- Ensure that all stakeholders can raise concerns without fear of reprisal and with full confidence that their identities will not be revealed.
- Provide a swift and confidential process for rectifying malfeasance wherever and whenever it occurs in the company.

SCOPE

Whistle Blowing System is to be adopted when a member of Hinopak family observes any noncompliance with respect to the basic principles of Hinopak's Code of Conduct and ethical standards, observes/notice any fraudulent activities and misappropriation of assets. In addition to above, Hinopak family member may also give his / her suggestions through Whistle Blowing for improvement of company's systems.

MEMBERS OF THE WHISTLE BLOWING COMMITTEE

- 1) President & CEO
- 2) Executive Vice President
- 3) Vice President – HR, Admin & HSE / Finance & IT
- 4) Senior Manager - Finance
- 5) Senior Manager – HR, Admin & HSE (Committee Secretary)

HOW IT WORKS

1. Any member of Hinopak family can blow the whistle by dropping the concern / suggestion in the Suggestion Boxes placed across the company or approach the members directly or through Hinopak website at info@hinopak.com.
2. Concerns / suggestion may be raised anonymously by members of the Hinopak family. Although such concerns will be entertained but the members are required to avoid making false or irrelevant allegations by being anonymous.
3. All members of Hinopak family are required that the concerns to be reported in writing in a prescribed form available at Company's portal to ensure a clear understanding of the issues being raised. It must contain the background, the nature of concern, relevant dates and timings where possible and the reasons for the concern / suggestion.
4. To ensure transparency, the suggestion box and emails are opened by the secretary of the committee periodically along with a member of the committee.
5. Initial inquiries and assessments will be made by secretary of the committee and relevant discussion may be made with HR personnel and respective department (if required) to determine the causes of such concern and necessary steps needed to cater the situation in future.
6. The secretary of the committee will present the matters in the next committee meeting.
7. In the whistle blowing committee meeting, initial inquiries and assessments are presented and suggestions are obtained from all members of the committee for the resolution of the concern. After taking relevant input, the committee will decide the future course of action.
8. The CEO after consultation with the committee members shall place the significant whistle blowing concerns (if any) to the Board periodically, clearly disclosing how such matters were dealt with and finally resolved or concluded.

CONFIDENTIALITY AND PROTECTION MECHANISM

The Policy assures that all concerns / suggestions will be handled in complete confidence, in the unlikely event that the identity of Whistle Blower revealed to any person in the Company, it will be ensured that the concerned person is not subjected to any form of detrimental treatment.

INVESTIGATION & REPORTING

1. An investigation of unspecified wrongdoing or broad allegations may not be undertaken without verifiable evidentiary support.
2. Deliberately making a false concern is also an allegation under this Policy and may lead to a disciplinary / penal action against the complainant.



YOSHIHIKO NANAMI

President & CEO

Dated: April 1, 2019