

Whistle Blowing Policy

The Company's Whistle Blowing Policy is being named as **Satark**, which means alert / vigilant. This Policy entails employees of the Company to raise concerns internally about possible irregularities, governance weaknesses, financial reporting issues or other such matters of irregularities.

The measures under this policy are expected to bring greater transparency and lead to better governance and work culture. Where the Management is able to confirm tenability of the Complaint, suitable and appropriate action is initiated against the person(s) responsible for the wrong doings and bring a halt to malpractices emerged as a result.

Scope of the Policy:

This Policy is applicable to all the employees of the Company. This policy is applicable only in case there is complaint by employee raising concerns / issues. This Policy shall not be used by any employee to settle personal scores / grudges. Employees found to have used for these purposes will be suitably dealt with. The Committee shall have the right to decide on acceptance of complaint from any other source.

Cases in which Employees can raise their Concerns / Issues / Complaints:

An employee can raise concerns / issues and / or file a complaint / report to the Management in the following cases:

- a. On account of discrimination based on employment and Service Conditions, religion, race, caste, sex or any of them.
- b. In an event of fraud / irregularities, financial reporting issues which have come to light as caused or suspected to have been caused, based on substantial and factual evidence.
- c. This policy does not cover the complaints / reports by women employees as to sexual harassment in work place. In that regard a separate procedure is followed as mentioned in Sexual Harassment Policy.
- d. Abuse of official power and privileges – like willfully awarding contracts with intent to personally benefit from the same, allowing issuance of insurance policies knowing that the case does not conform to the underwriting policy and business guidelines of the Company etc., provided however, a genuine business decision, within the allowable parameters of deviation, taken by employee with prior consultation and permission of competent authority does not fall under the definition of “abuse of official powers and privileges”.
- e. Willful collusion or connivance to cause unlawful loss or unjust disadvantage to the Company – like colluding with third parties to have the approval and settlement of fictitious, fraudulent, intentionally exaggerated or inflated claims.
- f. Concerns / Issues / Complaint / report as to one or more than one employee manhandling the employee/s during or in the course of the business of our Company or personally abusing employee with abusive language or using unparliamentarily language.
- g. Embezzlement / concealment / misappropriation of funds and abetment of such frauds.
- h. IT-related fraud - like compromising data integrity, misuse of authority, leaking or giving access to Company's systems etc., to unauthorized persons, sabotage, hacking, viruses, etc.
- i. Agent and Broker related fraud - like retention and theft of premium, brokerage and commission fraud, claims and application fraud initiated or performed by agents / brokers and includes money laundering, terrorism / terrorist / Anti Social financing, KYC & mis-selling.

- j. Misappropriation of assets of the Company - like theft, damage, conniving or colluding with theft/damage by third parties, etc.,
- k. Supplier fraud - like supply of inferior services / goods, intentional incorrect invoices, manipulation of procurement processes, taking money from suppliers for awarding contracts etc.
- l. Any acts which will be prejudicial or affects the interests of the Company, such as not producing proper documents as per directions of Court or statutory authority, though same are within the control of the person, not deposing in Court as witness.
- m. Non-compliance of regulations.

This list is illustrative in terms of subject matters and not meant to unduly restrict the scope of the Policy. Complaints can be made by any employee on his / her own or on behalf of another employee. Employee can in confidence report directly to the Chairman of the Board of Directors or of a Committee of the Board or to the External Auditor.

Whistle Blowing Committee

In this regard a Whistle Blowing Committee (also referred to as “the Ethics Committee” or “the Committee”) has been established for reviewing communication and taking appropriate action, with particular attention to take care of complaints, as mentioned hereinafter.

The Committee will be chaired by the Head HR of the Company and shall consist of the heads of the following departments as other members:

- i. Head of Internal Audit,
- ii. Head of Legal,
- iii. Head of Compliance,
- iv. Chief Risk Officer,
- v. Head of Finance (VP-Finance),
- vi. Head of Underwriting and
- vii. Head of Claims

Meetings of the Committee should be preferably held on a quarterly basis. The quorum of the Committee should be a minimum of two members or one third of the total members of the Committee, whichever is greater. The CEO shall have the right to change the Committee members.

Voting: All Members of the Committee shall be entitled to one vote on each issue for which the vote is being taken. Motions shall be passed based on majority of votes. In the event of any issue arising wherein any matter related to the respective department of the Member is in question, then such Member will not be entitled to vote on any motion pertaining to that issue.

How Do Employees Raise Their Concerns/Issues/ Complaints?

- a) Concerns / Issues / Complaint / report in physical form or by email have to be addressed to any of the members of the Committee giving full details of the subject with supporting evidence properly signed by the complainant giving full name, location, employee number and contact details.
- b) Evidence gathered should be produced along with the Concerns / Issues / Complaint / report. It should be noted that the evidence should be gathered only through lawful means and by honoring the procedures to be followed.
- c) Record to be submitted in a sealed envelope marked as "CONFIDENTIAL".

Escalation to the Chairman of Audit Committee

In appropriate cases, if an employee is not satisfied with the outcome of the process followed in resolving the complaint filed with the Whistle Blowing Committee, he / she may approach the

Chairman of the Audit Committee of the Board of Directors. The employee may send the letter in a sealed envelope, marked as "Confidential" to the following address:

The Chairman of the Audit Committee
Bajaj Allianz General Insurance Company Limited
GE Plaza, 1st Floor, Yerawada, Airport Road, Pune – 411 006

Redressal of Employees Concerns / Issues / Complaint / Report:

Concerns / Issues / Complaint / report received shall be scrutinized. Further any Concerns / Issues / Complaint / report not duly supported by documents / evidence with verifiable facts will not be considered.

All complaints under this policy shall be examined by the Committee constituted under this policy. All members of the Committee shall handle and assess any Complaints in an independent and fair manner and to safeguard the necessary confidentiality and to safeguard the interest of the Company.

Decision of Management:

The Committee shall examine and determine the Concerns / Issues / Complaint / report of employee and take suitable steps / action to resolve them.

Before any action is taken / decision is reached, the person against whom the complaint is made (accused) should be given sufficient opportunity of being heard and to present his case following the principles of natural justice. In case of employees on contract basis against whom complaint was made, the concerned contractor will be informed of the decision of Management for suitable action that should be taken by the contractor. The decision of the Committee shall be communicated to all the concerned parties.

The aggrieved person shall have the right to appeal against the order to the CEO.

Confidentiality:

Management undertakes to maintain confidentiality of the person (complaining employee) who has raised the Concerns / Issues / Complaint / report.

Appreciation:

Management may, at its sole discretion, suitably reward the complainant employee as a mark of appreciation and for his concern for the Company.

False & Frivolous Complaints:

In cases, where Management ascertains that the Concerns / Issues / Complaint / report of the complainant is false, frivolous or a deliberate and willful attempt to tarnish or malign the image of others or meant / intended to affect the reputation of employees against whom complaint was made or of the Company, the Management reserves the right to take suitable action, including disciplinary action or other legal steps / proceedings against such employee(s).

Last updated on	10 th May 2014
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