

Bharti AXA General Insurance Co. Ltd



Whistleblower Policy

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**Bharti AXA General Insurance
Co.Ltd**

Whistleblower Policy



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THIS MANUAL

- Is an approved document of Bharti AXA General Insurance Co.Ltd.
- Is a controlled document. Which reflects the date and status of the document

AMENDMENTS

- User should communicate the request for change to Risk Management team

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Policy Signoff & Circulation List

Signoff

Name	Position	Status	Date
Sanjeev Srinivasan	CEO & MD	Approved	
Nilesh Kambli	CFO	Approved	
XXXX	VP-Risk Management	Approved	
Amit Raheja	Chief Compliance Officer	Approved	

Circulation List

The document is distributed to all the signatories mentioned above and to all Bharti AXA General Insurance Co Ltd Employees




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Amendment History

Sl. No.	Version No.	Date of change	Who	Brief description of change
1	V01		Chetan D	
2	V02	18-Oct-2011	Satyanandan Atyam	Changes as required because of changes in the roles
3	V03	01-Aug-2013	Parag Deodhar	Changes in contact details
4	V04	08-Jul-2016	Prabu N	Alignment of AXA Policy with BAGI Policy
5	V05	07-Mar-2018	Prabu N	Changes in contact details
6	V06	24-Jan-2019	Isha Priyadarshini	Change in Whistle Blower E-mail ID

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1. Objective

1.1. The objective of this Bharti AXA General Insurance Company Pvt Ltd (Bharti AXA GI) Whistleblower Policy ('Policy') is to:

- support the reporting of suspected instances of improper practices or behaviour which may implicate the ethical standards or integrity of Bharti AXA GI and that normal investigative and/or complaint handling procedures are not considered adequate; and
- outline the mechanisms and infrastructure in place within Bharti AXA GI for the reporting and investigation of matters raised by a Whistleblower; and
- outline the measures in place to protect employees against reprisal or recriminatory action from within the organization.

2. Scope and Coverage


2.1. This policy applies to whole of Bharti AXA General Insurance Company Limited.

3. Types of Misconduct

3.1. Misconduct can take many different forms but for ease of data analysis Bharti AXA GI uses eight generic types of misconduct:


- 3.1.1. Human resources matters (including harassment, discrimination, inadequate behaviour at work and/silky or any potential breach of local Labour Law)
- 3.1.2. Misappropriation of assets (including theft; misuse or abuse of company assets such as phone, computer, funds; data leakage etc.)
- 3.1.3. Financial statement fraud (misrepresentation, falsification, concealment, misstatement or omission of financial records)
- 3.1.4. Other fraudulent statement (i.e., related to non-financial management information such as HR, strategic, commercial, asset management, etc.)
- 3.1.5. Corruption, bribery, extortion (including gift, commission, political contribution, conflict of interest etc. that are not compliant with GSH, AXA Asia Compliance and Ethics Guide's and/or any local legislation)
- 3.1.6. Other breach of applicable laws or regulation (including unfair competition / anti-trust, insider trading, Money laundering and financing terrorism)
- 3.1.7. Endangering health, life and/or safety
- 3.1.8. Customer mistreatment

This list is simply to facilitate reporting of the events in a consistent manner; it is not intended that this list be considered as a comprehensive list of subjects upon which whistle-blowing events can be made.

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4. Whistleblower Reporting and Escalation Process

- 4.1. The whistleblowing mechanism will be overseen by the Ombudsperson's Office of Bharti.
- 4.2. Any member of staff is encouraged to directly raise the issues / report the suspected instance through:
- speaking with the Chief Compliance Officer; or writing to his office address.
 - sending an email to: incident.report.gi@bharti.axa.com
- 4.3. Chief Compliance Officer would be monitoring the whistleblowing complaints received by the company.
- 4.4. The Whistleblowing complaints on operational in nature will get investigated through the internal Fraud Control Unit of the company and actions will be taken against those individuals whom the Complaint has been made is found guilty, under intimation to Ombudsperson office of Bharti.
- 4.5. If the received complaint is not in operational nature, it will be directly forwarded to the Ombudsperson office of Bharti. Ombudsperson's of Bharti shall update the findings of the Complaint to the CEO and Chief Compliance Officer of BAGI.
- 4.6. Ombudsperson office of Bharti to present quarterly update on the whistleblowing complaints to the Board audit and Compliance committee of the company.
- 4.7. The contact person for the Ombudsperson's are as below
1. Vijaya Sampath - vijaya.sampath@bharti.in and
 2. Subha Srivatsava - Shubha.Srivastava@Bharti.in
- 4.8. There is no specific format required for the Whistleblower Report, but the report should include sufficient information to allow investigation to be conducted, such as:
- The name of the concerned party(ies)
 - Sufficient details of the incidence with supporting materials, if any
 - Contact details (e.g. an email address or telephone number) for the CCO to follow-up.
- 4.9. Should a Whistleblower wish to remain anonymous it is important that they provide either enough information to facilitate a thorough investigation into the matter(s) being raised or anonymized contact details (e.g. email address) for follow-up.
- 4.10. The Whistleblower should make the report in good faith and have reasonable grounds to suspect the information he/she is reporting indicates misconduct occurred. Deliberate false reporting will not be tolerated, and anyone found making a deliberate false report will be subjected to disciplinary action, which could include dismissal.

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- 4.11. Chief Compliance Officer will have direct and unrestricted access to financial, legal and operational assistance when this is required. All employees of Bharti AXA GI are required to co-operate in investigations.
- 4.12. Under certain circumstances, the member of staff may be contacted for additional information to clarify the notification made.
- 4.13. Any individual who is the subject of an allegation and is under investigation should be given a fair opportunity to respond to the allegation, if appropriate. The person who is whistle-blowed against must not be notified of the allegation against them until such time that this has been approved by the Chief Compliance Officer.
- 4.14. Confidentiality must be ensured at all times and every reasonable efforts must be taken to keep the whistle-blower's identity confidential. This is critical in ensuring that no reprisal or retaliatory action is taken against the Whistleblower. Revealing the existence of an investigation or details contrary to this policy could result in disciplinary action.