

ARAI/Complaints Redressal

Version No.03

Version Date: July 30, 2024

1.0 Purpose:

To define a procedure for The laboratory for receiving, evaluating, making decisions and taking necessary corrective action on complaints with an objective to improve our internal processes and to enhance customer satisfaction.

2.0 Scope:

Receiving, Validating, Investigating, deciding the actions, tracking & recording communicating the action initiated or taken to the respective interested parties.

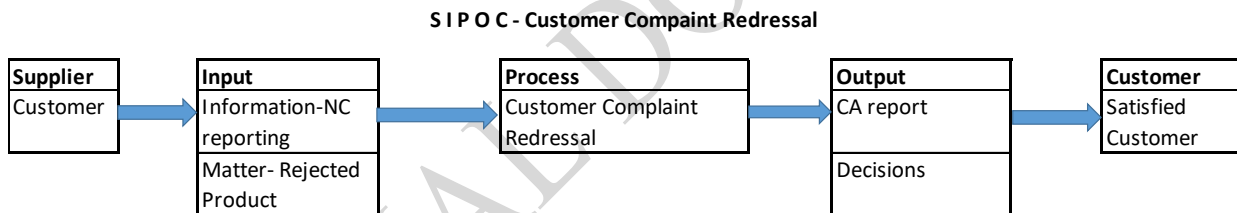
3.0 Reference:

Clause 7.9 of ISO/IEC17025-2017

4.0 Responsibility:

HoDs and QM are responsible for implementation and maintain this procedure in their respective area.

5.0 Procedure:



Process Performance

Monitoring Parameter	Customer Complaint Analysis		
Process Control	Acknowledgement communication	On time Corrective Action	Complaint Trend Analysis

- 5.1 A description of the handling process for complaints is available to any interested party on request.
- 5.2 Upon receipt of complaint, HoD verify the correctness & completeness of the complaint. Once confirmed, whenever possible, HoD acknowledges receipt of the complaint, and provides the complainant with progress reports and the outcome through e-mail or other mode of communication.
- 5.3 QM coordinate with respective laboratories to resolve the complaints and communicate necessary actions initiated or completed by the lab.
- 5.4 HoD and team shall perform following steps to address the complaint received and initiate necessary correction and or corrective actions to avoid recurrence of complaints.

Prepared by	MR	Approved by	DIRECTOR
--------------------	----	--------------------	----------

ARAI/Complaints Redressal

Version No.03

Version Date: July 30, 2024

- a) Investigate the cause for the complaint.
 - b) Initiate Correction, if required
 - c) Identify the need for corrective action and initiate by rework or corrective action to remove chance recurrence.
 - d) Tracking & record action implementation
 - e) Review and update Lab risk assessment register, if required.
 - f) Communicate actions initiated or taken to QM.
 - g) Maintain above records as per “ARAI/Complaints logbook” format referred below
- 5.5 QM shall review the Corrective action report and in case of clarification or doubt may contact HoD of respective department.
- 5.6 HoD shall communicate the action initiated or taken to the respective interested parties.
- 5.8 HoD or QM shall explain description of the complaint handling process on request of any interested party on request.
- 5.9 QM shall analyze complaint data and initiate necessary action for continual improvement of processes.
- 5.10 Summary of Customer complaints and Corrective Actions are discussed in Management Review Meeting. Refer ARAI/Management Review Meeting Procedure.
- 6.0 Records:**
- 1) Complaint Register.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Complaints Redressal

Version No.03

Version Date: July 30, 2024

ARAI/Complaint Logbook						
Sr. no	Date and Mode of Communication of Complaint	Customer Name/ Person	Complaint Details	Analysis and Corrective Action	Completion Date and Responsibility	Remarks by HoD

Prepared by	MR	Approved by	DIRECTOR
--------------------	----	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

1.0 FROM THE DIRECTOR'S DESK

Having completed 57 glorious years of service to the Nation, ARAI has assumed a character of a respected and independent Research Institute. With this achievement comes great responsibility for all of us. We must act with integrity in everything we do, in every decision we make, and in every decision, we see others make in all spheres of our service. We must act with unquestionable integrity while bringing all the passion, creativity and innovation within us.

Our core and business values; Caring, Commitment, Trust and Passion underpin everything we do. The Code of Business Conduct and Ethics (CBCE) serves as our guide and shows us what is expected of us in all our business activities. Of course, no Code or formal document in business scenario can anticipate all circumstances and also does not substitute personal responsibility. If you observe something which is not aligned with the CBCE, make it a point to raise it to the appropriate authority. The entire management team will support you in clarifying the situation and advising appropriately. It is our responsibility as the leadership team of ARAI to ensure that employees can raise their doubts without fear.

While codes and policies are important, ultimately the success of our integrity and compliance rests with all of us, as individuals. Whatever the circumstances, one is expected to act with complete integrity at all times.

A better sense of our roles, character and integrity is with all of us. It is the value system that we create, we realize and live that will transform ARAI to a global level and enable all of us to reap the rewards and successes to come.

My warm regards to all,

DIRECTOR



Prepared by	CHIEF VIGILANCE OFFICER	Approved by	DIRECTOR
--------------------	-------------------------	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

2.0 VISION AND MISSION

2.1 Vision

- To become a world-class Mobility Engineering, Research and Innovation Institution
- To be a leading Global Automotive Certification, Testing and Evaluation Organization

2.2 Mission

- Create and facilitate SAFE, SUSTAINABLE and SMART Mobility Solutions

3.0 VALUES

- **Care**
We always demonstrate awareness and consideration for the wellbeing of others. Our operations are safe and environment friendly.
- **Commitment**
We are committed towards all our stakeholders and betterment of eco-system.
- **Passion**
We are passionate in offering solutions which emanates from creativity, innovation and continuous improvement.
- **Trust**
The way we deliver our services are founded on trust.



Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
-------------	---	-------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

4.0 PURPOSE AND SCOPE

- 4.1 The purpose of CBCE is to establish processes to minimise the risk of fraud, and misappropriation or misuse of our assets to protect our business interest.
- 4.2 The scope of Code of Business Conduct and Ethics (CBCE) provides ethical guidelines and expectations for conducting business on behalf of ARAI & encompasses all employees and individuals on ARAI Payroll, on contract, sub-contract, consultant or any other such basis.
- 4.3 Suppliers, service providers, external professionals, agents and customers, serve as an extension of ARAI. Their conduct and behaviour while carrying out business dealings with ARAI can have an impact on ARAI and its reputation. For this reason, along with the applicable Legal Contractual obligations, they are expected to conduct their businesses in an ethical manner and to adhere to CBCE at large.

Therefore, this Code sets out behaviour with:

- a) our employees, or those who work with us;
- b) our customers, suppliers, service providers, affiliates, agents etc;
- c) the communities and the environment in which we operate;
- d) Government Authorities;

4.4 Our Employees:

4.4.1 Equal Opportunity Employer

- a. At ARAI, we value diversity and respect dignity of each individual. We provide an equal opportunity workplace, which is free from any kind of discrimination, harassment, disparity, gender bias etc.
- b. We ensure that, employment and internal promotion related decisions are based on performance, merit, competence and potential.
- c. We do not discriminate, harass employees on the basis of race, caste, colour, religion, creed, disability, gender, national origin, sexual orientation or any other legally protected status.
- d. We strictly adhere the policy on Prevention of Sexual Harassment at work (POSH) and therefore shun such behaviour involving violation of the said policy.
- e. We shall have fair, transparent and clear employee related policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code. These policies shall provide for clear terms of employment, training, development and performance management.

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

4.4.2 Dignity and respect

At ARAI, we value and respect dignity of each individual. We shall create a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy. we shall treat everyone in our work environment with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological. We have clear and fair disciplinary procedures, which necessarily include an employee's right to be heard. We respect our employees' right to privacy.

4.4.3 Employment Practices

We do not employ child labour at our workplaces and follow the necessary regulation in respect of that. We do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.

4.4.4 Bribery and corruption

We must ensure that no employee is involved in corruption or bribery as explained in subsequent paras.

Corruption is an abuse of a position of trust in order to gain an undue advantage. ARAI has 'zero tolerance' for corruption of any sort.

Bribery- A specific offence, which concerns the practice of offering something, usually money or other valuables, to gain an illicit advantage. e.g. Gifts, Money, Favors, Use of Organization's resources etc. ARAI has 'zero tolerance' for such instances.

We never offer, nor receive, directly or indirectly, any form of gift, entertainment or anything of value to or from any authoritative sources / officials, service providers, customers or their representatives, nor do we allow third parties acting on our behalf, such as agents, consultants, suppliers and contractors to make or receive any payments like these to Influence business decisions or secure an unfair advantage.

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

4.4.5 Gifts and Hospitality

In connection with certain festivals and other occasions, it is customary in many parts of the world to exchange business gifts of nominal value as a goodwill gesture to customers, relevant officials and other parties who have business relationships.

Giving Gifts:

When we give a gift to a customer, an official or any third party, we should ensure...

- it is not for influencing business decisions or to gain an improper advantage in business;
- that it constitutes a bonafide promotion or goodwill gesture;
- It is not in the form of cash;
- such gifts are recorded in ARAI' books and records;

Accepting Gifts:

The same principles apply if a customer or supplier wishes to give us a gift or any other token of their appreciation.

Additionally, following should be ensured while accepting gift

- the gift should preferably bear a Corporate Logo on it.
- that in case the gift is contained in a wrapper, the employee should seek details from the person who is offering the gift.
- that in case the gift does not fit into ARAI's code of conduct, i.e. the gift appears very expensive and lavish and has the potential to influence the receiver, it should be politely declined. Such instances may also be brought to the notice of higher authorities/ HoDs/ Chief Vigilance Officer.

4.4.6 Freedom of association

We recognise that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our organisation. Our employees must notify and seek prior

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

approval for any such activity as per the 'Conflicts of Interest' clause 4.4.9 of this Code and in accordance with applicable organisation policies and law.

4.4.7 Outside Employment

Service Rules of ARAI do not permit any outside direct or indirect employment. If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment with any other Institute or business entity, it is considered outside employment and a conflict of interest. This includes performing services while working at ARAI as an employee, agent or contractor for a customer, supplier or any other entity that has a business relationship with ARAI.

4.4.8 Integrity of information and assets

Confidential Information or Data of ARAI

Since joining and as and when required all ARAI employees, shall sign a declaration/ undertaking w.r.t. Confidentiality and Non-disclosure, which details their confidentiality obligations towards ARAI Covering the following salient features

- a) Any Confidential information or data that might affect ARAI's business must be protected. It should be ensured that all such information and data is used for ARAI's business purposes only on need to know basis and that too by only authorised personnel.
- b) Our employees shall not make any wilful omissions or material misrepresentation that would compromise the integrity of our records, internal or external communications and reports, including the financial statements.
- c) Our employees shall seek proper authorisation prior to disclosing the organisation or business-related information.
- d) Our employees shall ensure the integrity of personal data or information provided by them to our organisation.
- e) We shall safeguard the privacy of all such data or information given to us in accordance with applicable organisation policies or law.
- f) Our employees shall respect and protect all confidential information and intellectual property of our organisation.

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

- g) Our employees shall promptly report to the Departmental HoD the loss, theft or destruction of any confidential information or intellectual property and data of our organisation or that of any third party.
- h) As employees, we have access to significant amount of ARAI's information that may not be available to the public and we should preserve the confidentiality of information obtained / received. ARAI's Confidential, private and sensitive information must be used with responsibility & control and protected from arbitrary or careless disclosure.
- i) Without proper authorisation public disclosure of Institute's confidential information is strictly prohibited. Confidential or proprietary information about clients, our organization, or other parties, which has been gained through employment or affiliation with ARAI, should not be used for personal advantage or for the benefit of third parties.
- j) Information received as a part of our job, should not be traded for personal benefit. Neither should the information be shared with our competitors. Employees should not take undue advantage of information obtained as a part of his/ her job, even after leaving ARAI.
- k) Confidential or proprietary information about our customers and third parties, which has been gained through employment or affiliation with ARAI, must not be used/ divulged for personal advantage or for the benefit of third parties.
- l) If ARAI intends to place customer's information on public domain, then same shall be informed to the customer. Unless agreed between the laboratory and customer or the customer makes the information publicly available or required to be shared as a part of legal requirement; all other information is to be regarded as proprietary and confidential.
- m) Information about the customer obtained from other sources (for e.g. complainant, legal/government authorities, accreditation body etc.), is regarded as confidential. The source is kept confidential to the customer unless otherwise agreed to by the source.
- n) ARAI ensures confidentiality of information by providing restricted access to customers or their representatives.

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

o) Intellectual Property

The Intellectual Property (IP) of ARAI must be protected as a vital business asset. Our IP portfolio includes copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands, test reports/ certificates, know-how, etc. We must ensure protection of our IP. It is important to ensure that to the extent permitted by law, the rights to all IP created using ARAI's time and expense that which are within the scope of our duties are assigned to and are the property of ARAI. We should promptly disclose any works, inventions or developments we create to obtain legal protection over them.

p) Use of ARAI's Assets

- a. Our employees shall use all assets of the organisation tangible and intangible, including computer and communication equipment, for the purpose for which they are provided and in order to conduct our business . Such assets shall not be misused
- b. Use of ARAI assets for individual profit or any unlawful, unauthorized personal or unethical purpose is strictly prohibited. Individuals should not misuse ID cards, Access control devices, passwords etc.
- c. It is the responsibility of all employees to prevent unauthorized access to ARAI's asset coming to their knowledge.
- d. Copyright materials (e.g., books, software, and magazines) should not be distributed, or altered without permission of the copyright owner or an authorized agent.
- e. Software used in connection with the business of ARAI should be properly licensed and used only in accordance with that license. Using pirated software could constitute copyright infringement and may act as ground for disciplinary action. For more information, refer document "Asset Management"

4.4.9 Conflicts of interest

a) Conflict – Meaning

When the interests or benefits of one person/ group of persons conflict with the interests or benefits of ARAI a conflict of interest is said to occur.

- b) We must avoid situations involving actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised.
- c) To enforce such control at a senior level, it is ensured that any HoD during last 6 months of retirement/or during the applicable notice period in case of resignation, shall not take any independent decision/action on any matters involving organisational interest, where he has discretionary powers and shall keep in loop any equivalent grade official and/or his next subordinate official in hierarchy.
- d) Apart from testing and calibration, as ARAI is involved in other activities like research and

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

development, the responsibility and authority to carry out such activities are well defined, communicated and all such activities are performed impartially.

e) **Recruitment of Employees**

In ARAI, recruitment is done based on the needs of ARAI. A special Committee set up for this purpose, will review the need received from the Department and the selection of candidates is done through the Committee through appropriate selection procedure laid down for this purpose. One of the selection criteria would be to ensure that there is no conflict of interest.

At the time of appointment in our organisation and during the employment our employees shall make full disclosure to the competent authority, of any interest leading to an actual or potential conflict that such persons or their immediate family (including parents, siblings, spouse, partner, children) or persons with whom they enjoy close personal relationships may have in a family business or an organisation or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with our organisation. Also, employee should disclose at the time of appointment and during the employment, holding of stocks of such stakeholders by the employee or their family member, if any. If there is a failure to make the required disclosure and our management becomes aware of an instance of conflict of interest that ought to have been disclosed by an employee, our management shall take a serious view of the matter and consider suitable disciplinary action as per the terms of employment. In all such matters, we shall follow clear and fair disciplinary procedures, respecting the employee's right to be heard.

f) **Outside Employment**

If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment with any other Institute or business entity, it is considered outside employment and a conflict of interest. This includes performing services while working at ARAI as an employee, agent or contractor for a customer, supplier or any other entity that has a business relationship with ARAI. Service Rules of ARAI do not permit any outside employment.

g) **Working with Family and Friends**

Conflicts of interest may also occur when we or our family members receive improper personal benefits or preferential treatment as a result of our position, or the position of a family member, in ARAI. Remember that such situations might impact our judgment or responsibilities towards ARAI, stakeholders, and customers.

To avoid conflict of interest and any appearance of favouritism, ensure that you do not work directly or supervise or make employment decisions about a family member or relative. This includes positions or assignments within the same department and the employment of such individuals in positions that have a financial or other dependence or influence (e.g., an

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

auditing or control relationship, or a supervisor / subordinate relationship).

Should any actual or potential conflicts of interest arise, the concerned person must immediately report such conflicts and if required seek approvals from the management.

4.4.10 Safe and Environment friendly operations

- ARAI's policy demands that everything we do leads to a create cleaner, healthier and safer environment for our employees
- Use of intoxicants like cigarettes, tobacco, narcotic drugs, psychotropic substances and alcohol at work is strictly prohibited for all employees, suppliers, service providers, external professionals, agents, visitors and customers.
- Possession and / or use of weapons / firearms or ammunition of any form are banned, except for security personnel or with special permission of competent authority.

4.4.11 Compliance with Applicable Laws and Regulations

Every employee must comply with all the laws, rules and regulations applicable to the Organisation and its employees. Senior Management Personnel shall oversee, compliance by employees with all such laws, rules and regulations.. Each Senior Management Personnel must acquire appropriate knowledge of the requirements relating to his duties sufficient to enable him to recognize potential non-compliance issues and to know when to seek advice from the Legal Department on specific policies and procedures of the Organization.

No payment or transaction should be made or undertaken, by a Senior Management Personnel or authorised or instructed to be made or undertaken by any other person or organization, if the consequences of that transaction or payment would be the violation of any law in force.

4.5 Our Customers, Suppliers & Service Providers

4.5.1 Services

We are committed for the services of world-class quality that meet all applicable standards. The services we offer shall comply with applicable laws. We shall market our services on their own merits and not make unfair or misleading statements about the services of our competitors.

4.5.2 Fair competition

We shall not enter into any activity constituting anti-competitive behaviour such as misuse of

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors. We collect competitive information only in the normal course of business and obtain the same through legally permitted sources and means. At ARAI, we believe that a free and fair market benefits all of us and ensure that our customers receive the best quality services at the best price.

Unfair pricing practices, secret rebates/ discounts, which are questionable and un-authorised should be prevented. Any such questionable practices in the course of work, for instance, while bidding for services, should be brought to the notice of the competent authority.

4.5.3 Fair Dealings

The goodwill ARAI enjoys is one of our most important assets and we must preserve and enhance our reputation to reinforce the same.

We must be professional, fair and transparent in our dealings with ARAI's customers, suppliers, partners, service providers, competitors and anyone else with whom we interact. We should not take unfair advantage of anyone through manipulation, concealment and misrepresentation of facts or any other unfair dealing practice.

We respect our customers' right to privacy in relation to their personal data. We shall safeguard our customers' personal data, in accordance with applicable law.

4.5.4 Industrial Espionage

We are committed to fair business by respecting the rights of our competitors and abiding by all applicable laws. As a lawful competitor and to help ensure the integrity of the competitive marketplace, we must respect our competitors. Ensure that information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, customers, business partners or competitors are not inappropriately used.

4.5.5 Selecting Suppliers

ARAI service providers play a significant role in our success. We strive to create an environment where our suppliers are confident that they will be treated with respect. We select our suppliers or enter into supplier Agreements through a competitive bidding process as per laid down procedure.

4.5.6 Selection of Contractors for Support Services

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

Selection of contractors for support services viz. security, canteen, garden, housekeeping, etc. is to be carried out at regular intervals through a competitive bidding process.

4.6 Communities and Environment in which we operate

4.6.1 Communities

We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate. We engage with the community and other stakeholders to minimise any adverse impact that our business operations may have on the local community and the environment. We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable, and in particular the 'Conflicts of Interest' clause are followed.

4.6.2 Environment

While offering services, technologies, data, testing solutions etc., we strive for environmental sustainability and comply with all related applicable laws and regulations. We seek to prevent the wasteful use of natural resources and are committed to improving the environment, particularly with regard to the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials. We shall endeavour to offset the effect of climate change in our activities with sustainable solutions.

4.6.3 Providing Information to the Media / External Agencies

To protect our confidential information from misuse and to ensure that only accurate information about ARAI is disclosed, we have designated team / person to handle exchanges with the media/ external agencies.

4.6.4 Speaking to the Media

Only Authorised officials should speak to media. Any inappropriate or inaccurate response (verbal/ written or gestural), even a simple 'YES/NO' or disclaimer of information, may result in adverse publicity and could otherwise gravely affect ARAI's legal position. Employees should therefore refrain from such involvements.

4.7 Government Authorities:

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

4.7.1 Political non-alignment

We shall act in accordance with the constitution and governance systems of the countries in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any system of government. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence/favour with any political body or person, and we do not offer or give any organisation funds or property or other resources as donations to any specific political party, candidate or campaign.

4.7.2 Government engagement

We engage with the government and regulators in a constructive manner in order to promote good governance. We conduct our interactions with them in a manner consistent with this Code. We do not impede, obstruct or improperly influence the conclusions of, or affect the integrity or availability of data or documents for any government review or investigation.

5. AUDITS AND RECORDS

5.1 Auditors

ARAI records are subjected to audit from outside auditors in a fair and accurate manner. ARAI exhibits transparency towards the audit procedure in accordance with the law.

5.2 Interacting with Regulators

Full cooperation is extended to examination or request for information from regulators or law enforcement agency/ies. Any contact/ communication with law enforcement agencies shall be coordinated through the authorised officials only.

6. RAISING CONCERNS

We encourage our employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles. Avenues available for raising concerns or queries or reporting cases could

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

include:

- immediate superior or the Human Resources department of our organisation
- designated vigilance officer of our organisation
- any other reporting channel set out in our organisation's 'Vigil Mechanism and Whistle-blower' policy

We do not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action. If you suspect that you or someone you know has been subjected to retaliation for raising a concern or for reporting a case, we encourage you to promptly contact your immediate superior, the organisation's Vigilance officer, the Human Resources department, or the Director.

Employee who want to report a concern under Prevention, Prohibition and Redressal of Sexual Harassment (POSH) should contact Internal Complaint Committee (ICC) in accordance with the set procedure "ARAI's Policy on Prevention, Prohibition and Redressal of Sexual Harassment".

6.1 COMPETENT AUTHORITIES TO ADDRESS CONCERNS

Sr. No.	Description of Concern	Competent Authority	Reference Procedure
1.	Discrimination & Harassment	HoD-HRM&A	CBCE, Service rules
2.	Harassment under POSH Act	Internal Complaint Committee (ICC) chairman	ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment
3.	Environmental, Health and Safety	Safety Officer	ARAI/ Environmental, Occupational Health and Safety Policy, ARAI/Emergency Preparedness & Response Plan, ARAI Quality Booklet

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	--	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

4.	Corruption	Vigilance Officer	CBCE & ARAI/Vigil Mechanism and Whistle Blower Policy
5.	Conflict of Interest	HoD-HRM&A	CBCE
6.	Organisational Intellectual Property	IP Committee	Information SMS Procedure
7.	Unfair Pricing Practices	Director / HoD-BD & CP	Purchase procedure
8.	Investigation of CBCE violation	Director / Designated Committee	
9.	External Investigation Update	Director / Designated Committee	

7. ACCOUNTABILITY

This Code is more than a set of prescriptive guidelines issued solely for the purpose of formal compliance. It represents our collective commitment to our value system and principles. Every person employed by us, directly or indirectly, should expect to be held accountable for his/her behaviour. Should such behaviour violate this Code, they may be subject to action according to their employment terms and relevant policies of the organisation. When followed in letter and in spirit, this Code is 'lived' by our employees as well as those who work with us. It represents our shared responsibility to all our stakeholders, and our mutual commitment to each other

Every employee must comply with all the laws, rules and regulations applicable to the Organisation and its employees. Senior Management employees shall oversee, compliance by employees with all such laws, rules and regulations. Each Senior Management employee must acquire appropriate knowledge of the requirements relating to his duties sufficient to enable him to recognize potential non-compliance issues and to know when to seek advice from the Legal Department on specific policies and procedures of the Organization.

HRM&A should arrange training to employees on this subject as and when required.

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	--	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

8. INVESTIGATIONS

A process to review and investigate all potential CBCE violations is in place. Investigations will be conducted by Competent Authorities in confidence and will be just & fair.

If an allegation is substantiated, an appropriate management team will review the findings and determine the final outcome. Any potential violation submitted in good faith will be assured of all support by ARAI. This support is extended to any person who is assisting in any investigation or process with respect to such a violation as well.

If you are the subject of an external investigation, you should immediately report this to Competent Authority unless it is prohibited by law.

9. DISCIPLINARY ACTION

- 9.1 It is responsibility of all employees to fully read this policy as well as all other policies and guidelines in order to remain aware at all times of the procedures, regulations and other requirements that are relevant or pertinent to each one's business or function. Inappropriate, wrongful or unethical behaviour by an employee, supervisor, customer, supplier or third-party can significantly compromise the reputation of ARAI. Such issues must, therefore, be reported immediately to the superior authorities. No action will be taken against anyone for reporting violations of the code in good faith, or participating or assisting in the investigation of a suspected violation of Code of Business Conduct and Ethics . Any act of retaliation against a person who reports such transgression, malpractice etc. would tantamount to a violation of the Code of Ethics and Business Conduct of ARAI.
- 9.2 Upon violating the CBCE, ARAI will take appropriate disciplinary action.
- 9.3 The matters covered in this CBCE are of utmost importance to ARAI, its stakeholders and business partners, and are essential to ARAI's ability to conduct its business in accordance with the stated values. All our executives, officers, employees and third-party agents are expected to adhere to these rules in carrying out their duties for ARAI.
- 9.4 Any violations of this CBCE, ARAI policies and applicable laws will be looked upon seriously. Wherever appropriate, ARAI will take prompt corrective action, up to and including termination of employment. Disciplinary action may include a verbal or written warning; suspension with or without pay; loss or reduction of remuneration / incentive; or, for the most serious offenses of repeated misconduct, termination of employment or legal recourse. In

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

case of committing of or participating in any offence of criminal nature, resulting in the arrest of any employee of ARAI, proper disciplinary action shall be initiated against such employee as mentioned in the Service Rules of ARAI.

9.4 Any disciplinary action depends on the nature, severity, and frequency of the violation. It may vary depending upon local applicable law. Any violation of the laws or regulations mentioned in the CBCE will be dealt with severely.

9.5 Disciplinary action will be taken if anyone :

- Violates the CBCE, ARAI's policies and procedures, or applicable laws
- directs others to violate the CBCE, ARAI's policies and procedures, or applicable laws.
- is aware of a violation or potential violation, and fail to report it.
- Fails to effectively monitor the actions of people you manage.
- Do not cooperate with ARAI's audit or investigation.
- Fails to participate in required training.
- Retaliates against someone for reporting a concern in good faith or for participating in an investigation of such a report.
- Discloses information learned during an internal investigation.

10 AMENDMENTS / MODIFICATIONS TO CBCE

Director ARAI is the final authority for approving and issuing the CBCE. This document is reviewed and updated periodically for changes in Legislations and/or ARAI, if any.

11. WAIVERS

A waiver of any particular provision of the CBCE, given under certain specific circumstances, requires prior written approval of Director .

12. ACKNOWLEDGEMENT/ ACCEPTANCE

CBCE or amendment(s) thereof will be disseminated to all employees. All employees are required to give a declaration (annexed below) that they have read and understood the CBCE and accept consequences thereof.

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

Annexure I

ACKNOWLEDGEMENT FORM

(To be Filled by employees at the timing of Joining)

I have received and read ARAI's Code of Business Conduct & Ethics (CBCE).

I understand the standards and policies contained therein and there may be additional policies or laws specific to my job and/or the location of my posting. I further agree to follow the values of ARAI in all that I do and comply.

If I have questions concerning the meaning or application of the CBCE, any ARAI's policies, or the legal and regulatory requirements applicable to my job, I know I can consult the Competent Authority fully being aware that my questions or reports will be maintained confidential.

Name of the employee:

P. No. :

Signature:

Date:

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024

Annexure II

ANNUAL DECLARATION FORM FOR CBCE COMPLIANCE

(INCLUDING IMPARTIALITY AND CONFIDENTIALTY)

I hereby declare that, I have read & understood CBCE policy and assure that I will adhere to the provisions of CBCE including impartiality & confidentiality.

Name of the employee:

P. No.:

Signature:

Date:

INTERNAL DOCUMENT

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI /Code of Business Conduct and Ethics

Version No.: 05

Version Date: 25.10.2024



INTERNAL DOCUMENT

Prepared by	CBCE Committee and Chief Vigilance Officer	Approved by	DIRECTOR
--------------------	---	--------------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

Amendment Record Sheet

Sr. No.	Ver. No.	Section / Clause / Para / line (as applicable)	Date of Amendment	Amendment made	Reasons of Amendment
1.	1	--	12.12.2017	Initial Version	-
2.	2	5.2.8 & 5.3	30.06.2020	I. Changes in flow of acquiring online feedback system for External customers ii. Internal customer feedback system updated	I. Modification in software program. ii. Online portal has been made for ICSS process.
3.	3	Annexure A ARAI / SERVICE SATISFACTION SURVEY FORM (For External Customer)	23.12.2021	Bifurcation of parameters under various management system.	As per input received from Director during MRM.
4.	4	--	14.07.2023	Single Portal for External Customer Feedback(ECSS) & Internal Customer Feedback (ICSS) (Earlier two separate portals) with single Login Id	Shifting of Old Online Customer Feedback system to New version
5.	5	--	17.07.2025	--	Periodic review of document
6.					
7.					
8.					
9.					
10.					

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

Table of Contents

1.0	Purpose :.....	Error! Bookmark not defined.
2.0	Scope:.....	3
3.0	Reference:.....	3
4.0	Responsibility:.....	3
5.0	Procedure :.....	Error! Bookmark not defined.
6.0	Records:.....	16

INTERNAL DOCUMENT

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

1.0 Purpose:

To define a procedure for acquiring Customer feedback, initiating and taking necessary corrective action wherever concerns are raised by Customer with an objective to improve our internal processes and enhance customer satisfaction.

2.0 Scope:

Receiving and compiling feedbacks received from the Customers (both internal and external).

3.0 Reference:

Clause 9.1.2, 9.3,10.2 of ISO9001-2015

4.0 Responsibility:

HoDs and MR are responsible for implementation and maintain this procedure in their respective area.

5.0 Procedure:

5.1 As a proactive approach towards continual improvement ARAI obtain External as well as Internal customer feedback.

5.2 External Feedback:

5.2.1 After completion of service, HoD shall send a feedback form to their respective customers through Online Portal for Customer Feedback System.

5.2.2 Methodology for acquiring Online Service Satisfaction Survey Forms through Customer Feedback Portal:

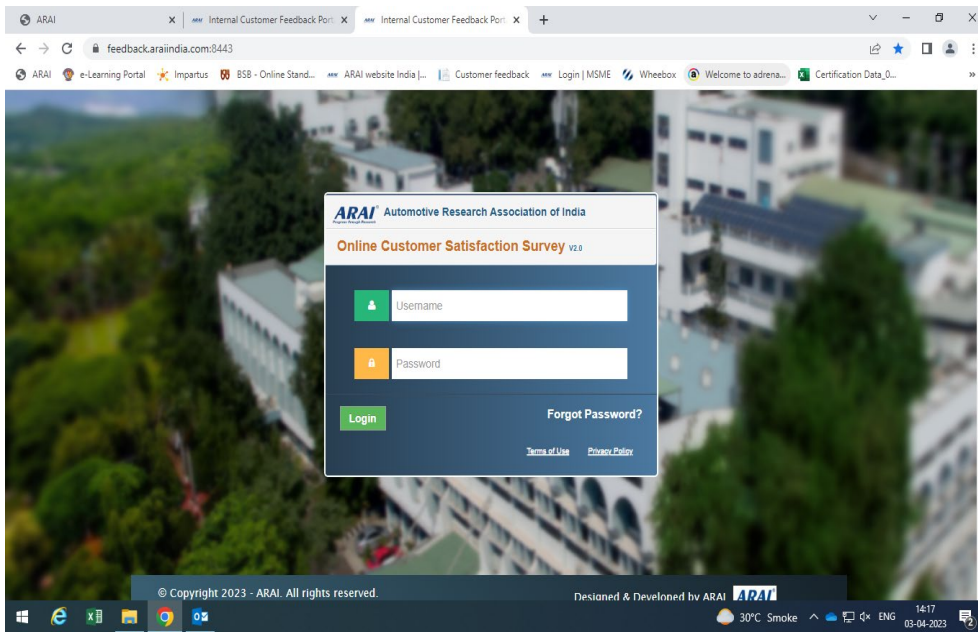
- a) Copy paste below link in **Google Chrome** browser
<https://feedback.araiindia.com:8443/> [Use Google Chrome only]
- b) Save this URL (Create Bookmark) for future use.
- c) In Login window; Key-in the credentials, User Name and Password.(Credentials are available with respective dept. HoD's)

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

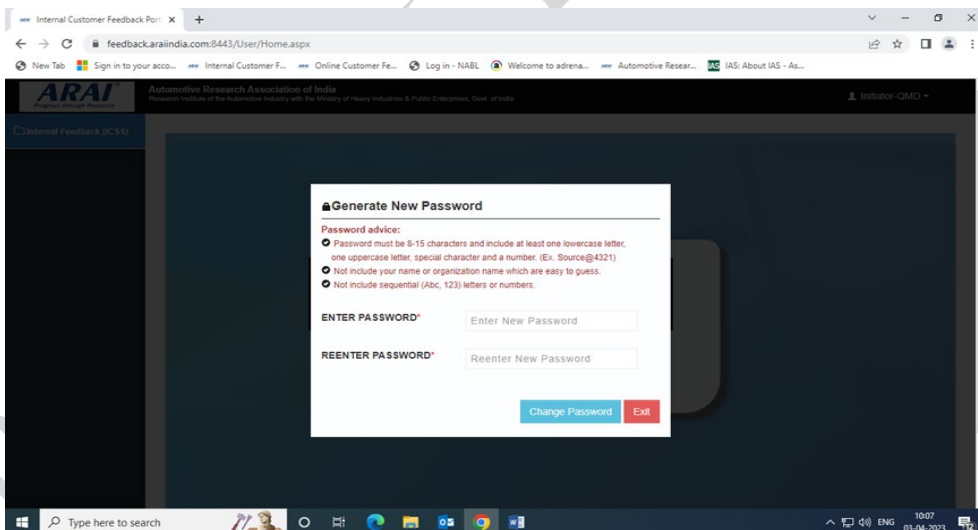
ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025



- d) After successful login, Portal will prompt for “Generate New Password”.
- Password Creation Rule :
- Password must be 8-15 characters and include at least one lowercase letter, one uppercase letter, special character and a number. (Ex. Source@4321)
- Not include your name or organization name (ARAI) which are easy to guess.
- Not include sequential (Abc, 123) letters or numbers.



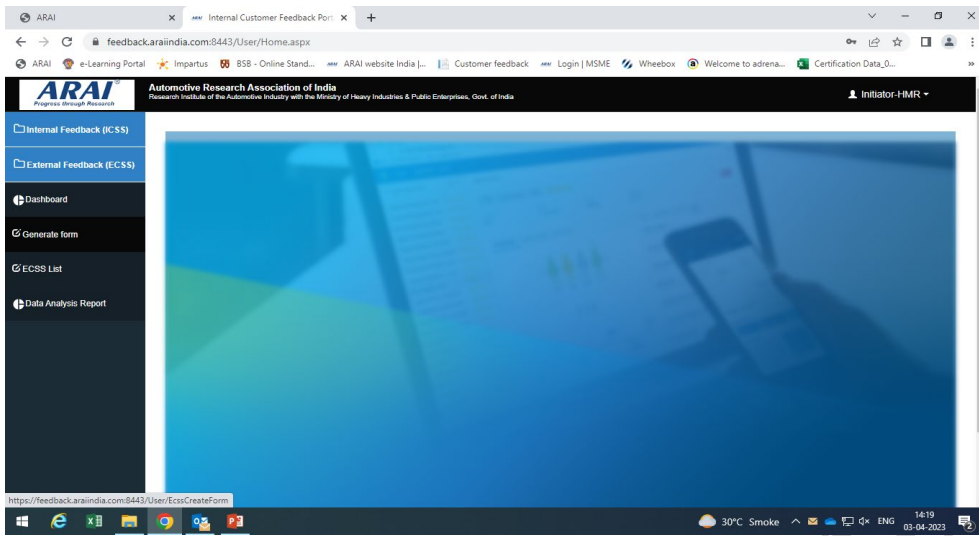
- e) After successful login, following screen will open.
To send the feedback, Click on “External Feedback (ECSS)” and details.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

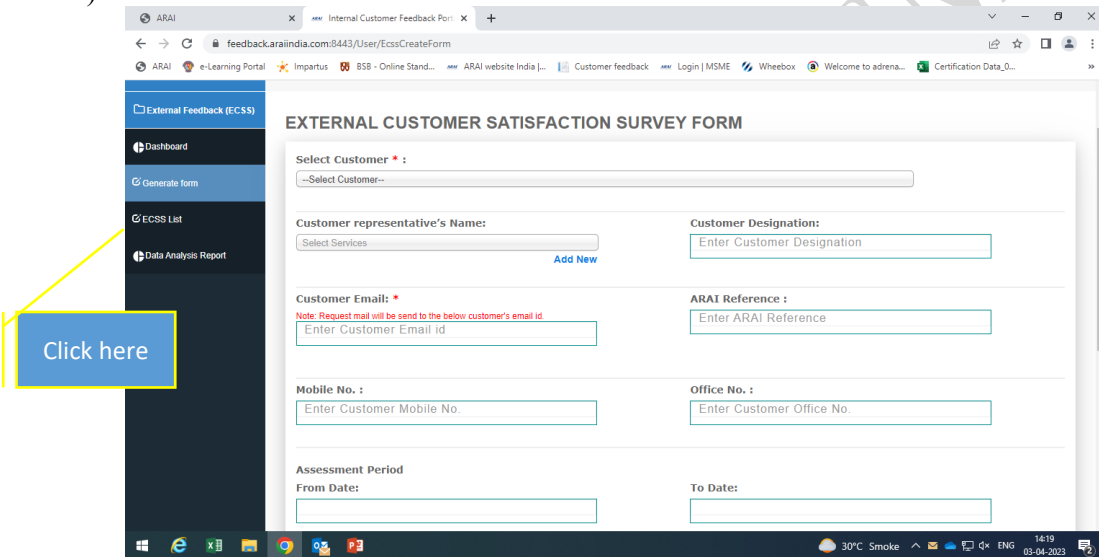
ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025



f) Select "Generate Form" to send feedback form to customer.



Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

- g) Fill relevant fields and submit the form by clicking “Submit to Customer” button. Refer below screen shot. The feedback form link will be delivered to the customer thru e-mail (auto generated).

Mobile No. : Office No. :

Assessment Period
From Date: To Date:

Select Department * :
HMR

Services availed (Optional):
 Other Services (Optional):

Submit to Customer

Click here

- h) To see all the feedbacks received in user department, Click “ECSS list”. User can view the list as shown below.

Customer Feedback **All departments transactions**

Assessment year: 2023-2024

Show 10 entries

Sr. No.	ECSS NO.	COMP NAME	DEPT	Open Date	Closed Date	STATUS	ACTION
1	ECSS-HMR-2324-04-1	MAHINDRA & MAHINDRA LTD.	HMR	03/04/2023		No action required	VIEW

Showing 1 to 1 of 1 entries

Go Back

Click here

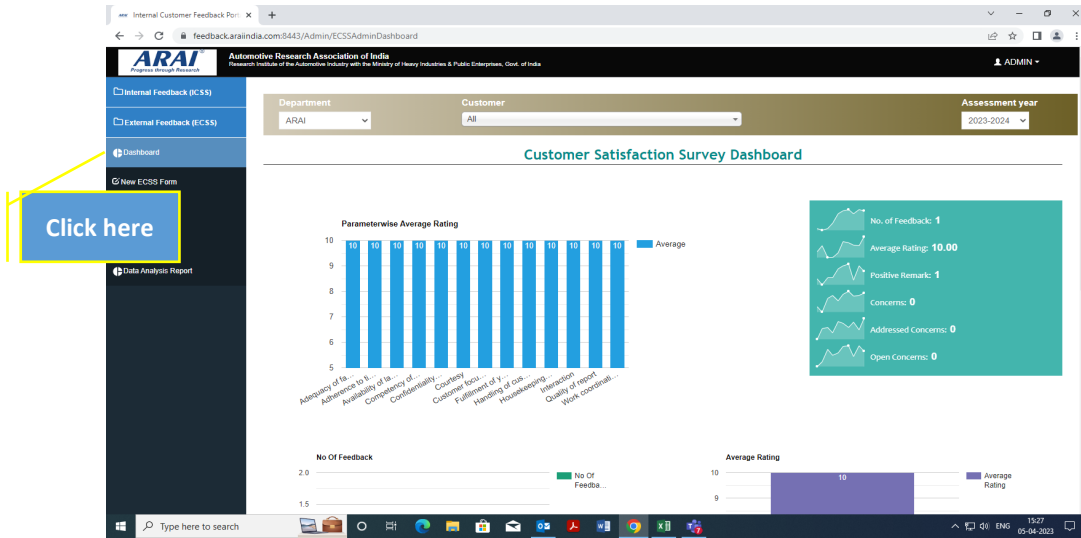
Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

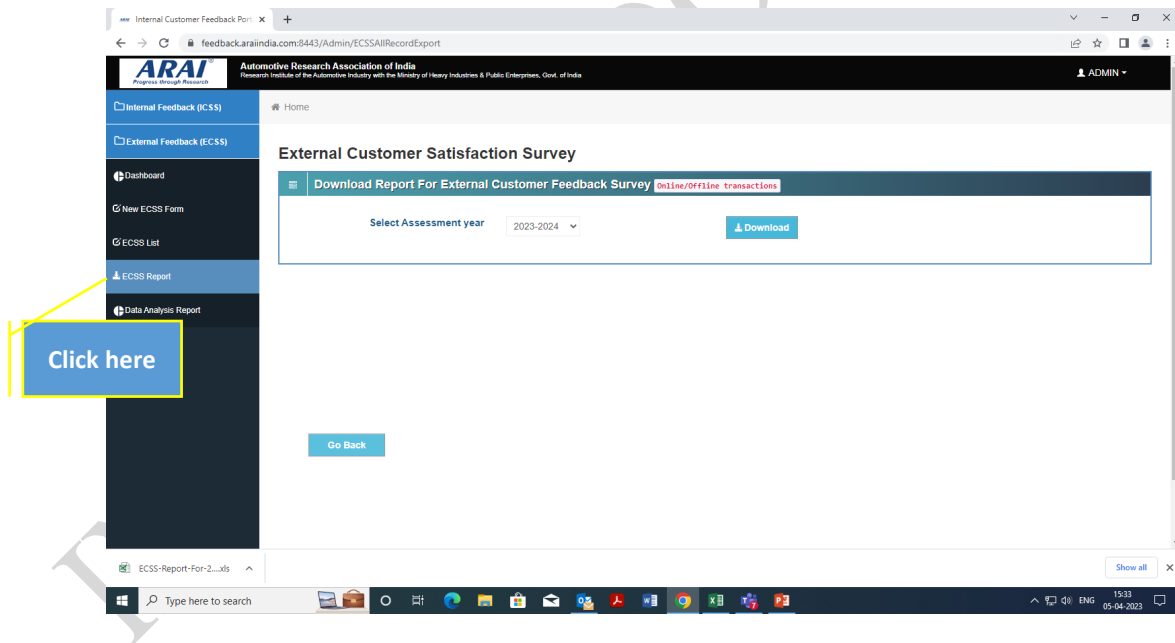
Version No.05

Version Date: July 17,2025

i) To see Customer Satisfaction Survey Dashboard, Click “Dashboard”.



j) To see Report i.e. Consolidated report-Click on ECSS report for particular Financial Year & download in xls.



Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

- k) To view the Customer Satisfaction Survey Summary-Click on Data Analysis Report and download the report.

SR. NO.	YEAR	NO. OF FEEDBACK	AVERAGE RATING	NO. OF POSITIVE REMARKS	NO. OF SUGGESTIONS	NO. OF CONCERN	NO. OF CONCERN ADDRESSED	NO. OF CO
1	2023-2024	1	10.00	1	0	0	0	0
2	2022-2023	347	9.49	216	40	3	3	0
3	2021-2022	282	9.54	195	36	6	4	2
4	2020-2021	164	9.52	141	33	2	2	0
5	2019-2020	213	9.57	207	26	10	9	1
6	2018-2019	208	9.36	218	27	38	38	0
7	2017-2018	240	9.34	204	24	52	49	3
8	2016-2017	174	9.33	179	23	39	36	3
9	2015-2016	204	9.50	207	13	41	41	0

- l) In case of “Suggestion for improvement” or “Where you were Dissatisfied”, please fill the details in the screen when “Respond” button is clicked and “Save” the entries. The auto generated mail will be delivered to Customer with action taken report.
- m) ‘Change Password’ will enable user to change his/her existing password for security reasons.
- n) Do keep changing password regularly for the data security.
- o) Click on Logout, once uploading is complete.

5.3 Methodology for Internal Customer Satisfaction Survey:

5.3.1 Service departments at ARAI e.g. HRMA, BDCP, QMD, ID, STO, PUR, ITM etc should send a Service Satisfaction form on an annual basis to the internal customers, seeking their feedback against the services offered to them.

5.3.2 Methodology for acquiring Online Internal Customer Satisfaction Survey Forms:

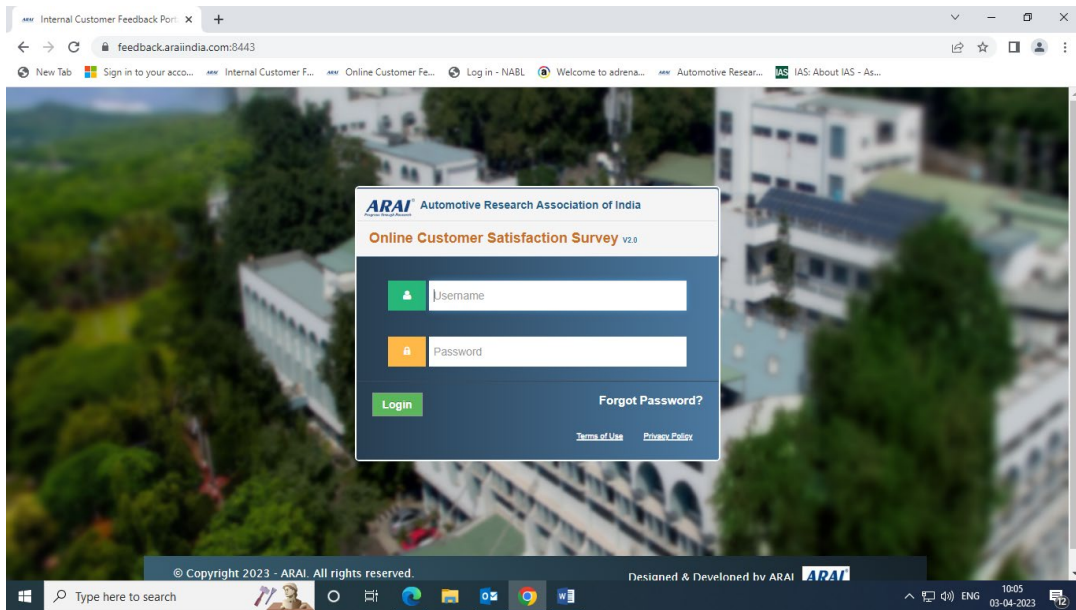
- a) Visit our Customer Feedback Portal Link [Use Google Chrome]
<https://feedback.araiindia.com:8443/> for sending feedback request to customer.
- b) Enter User name and Password to Login. Use IT guidelines for maintaining password.
- c) Key in the credentials.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

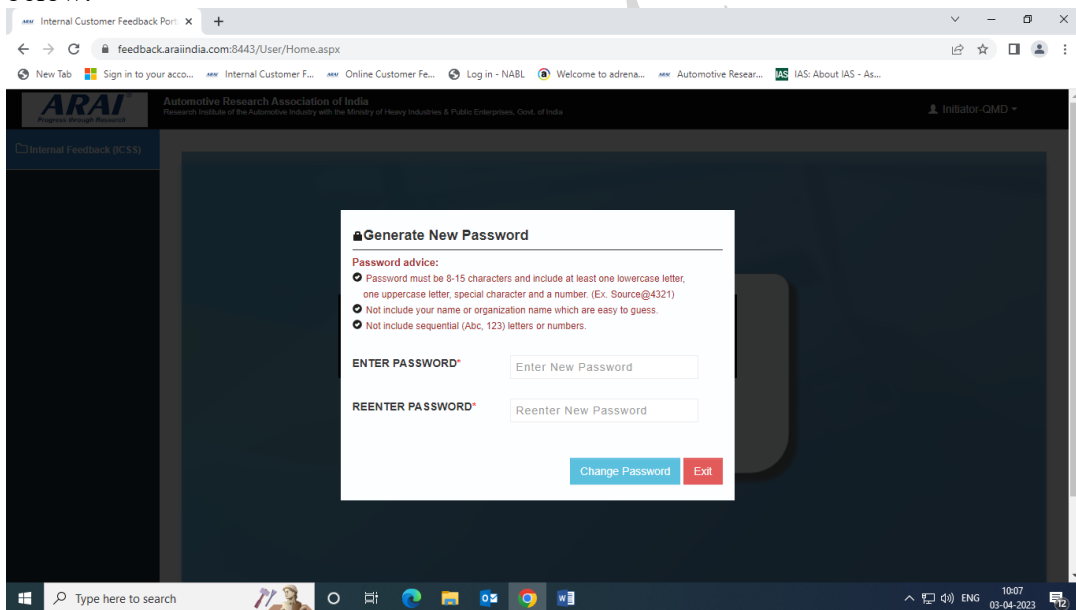
ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025



d) After successful login, Portal will prompt for “Generate New Password” as shown below.



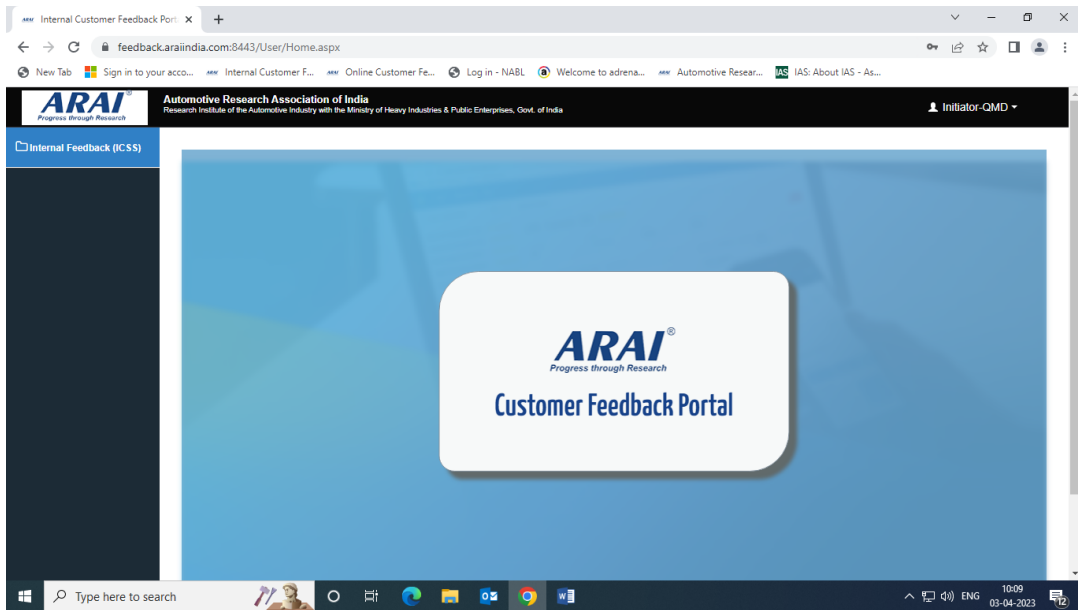
Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

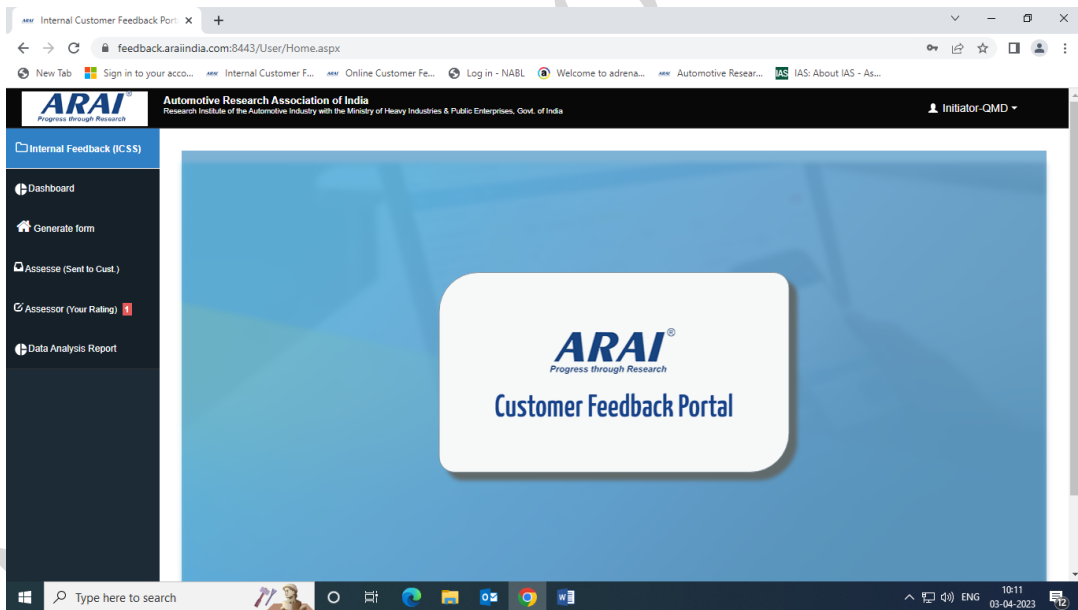
Version No.05

Version Date: July 17,2025

e) After successful change in password below screen will be visible.



f) At Internal Feedback [ICSS] menu will appear after the click as below,



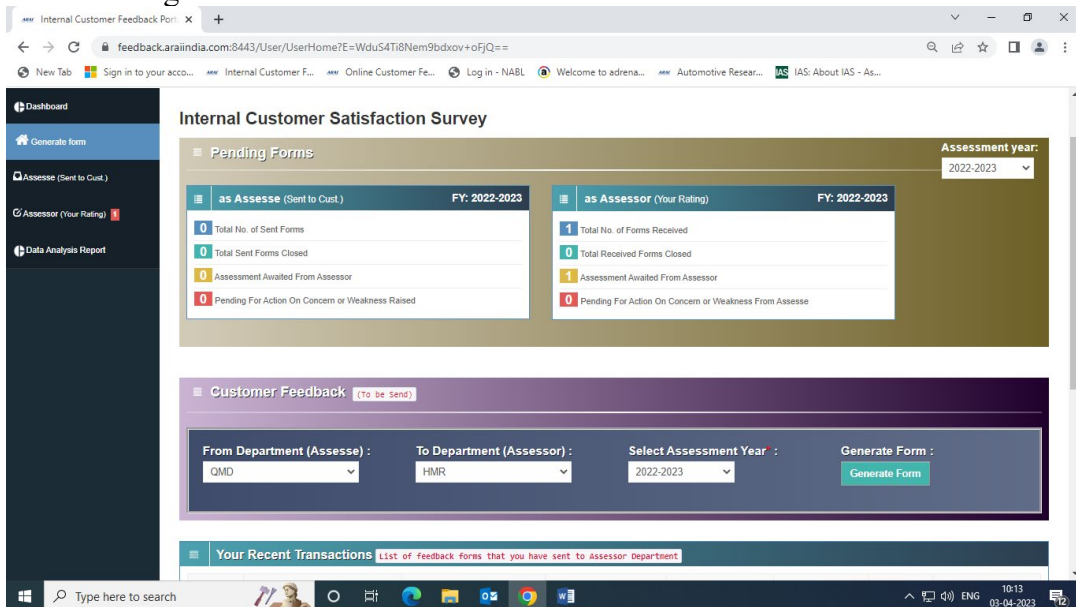
Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

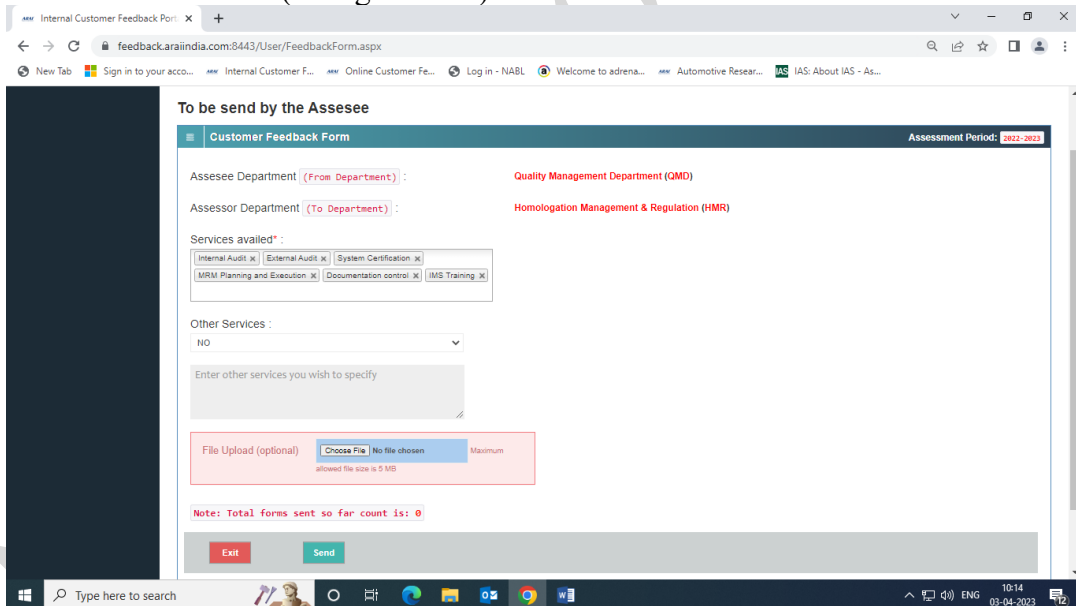
Version No.05

Version Date: July 17,2025

- g) At “Generate Form” from the menu select the departments seeking the feedback forms and click to generate form.



- h) Fill relevant fields and submit the form. The feedback form link will be delivered to the customer thru e-mail (auto generated).



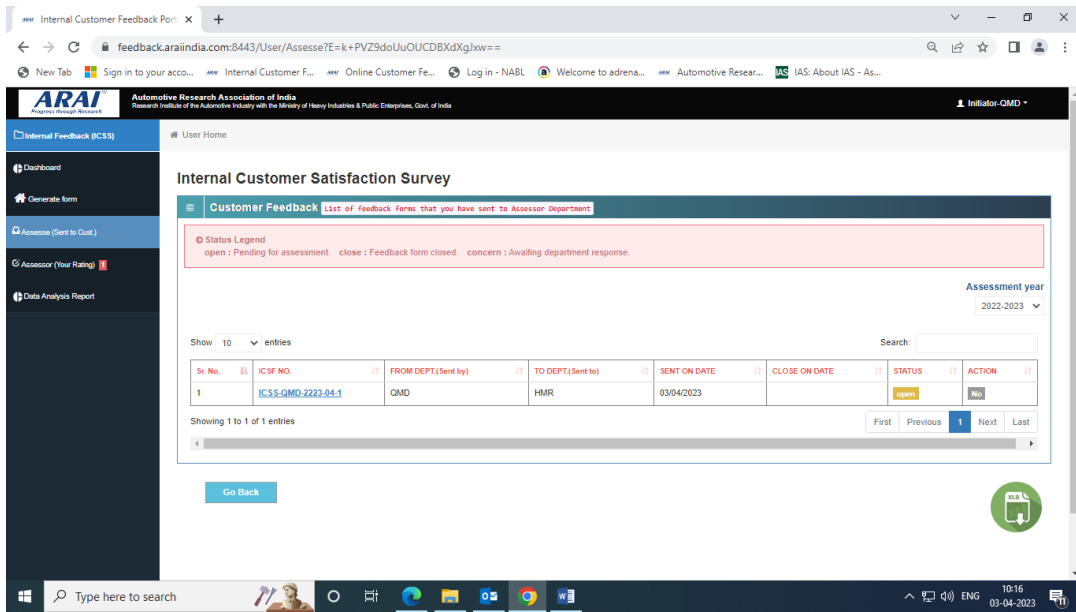
- i) To see all the feedbacks sent by Assesse department, Click on “Assesse (Sent to Customer). Assesse can also transfer the data of feedback form into .xls format by clicking the “Excel” sign below search option.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

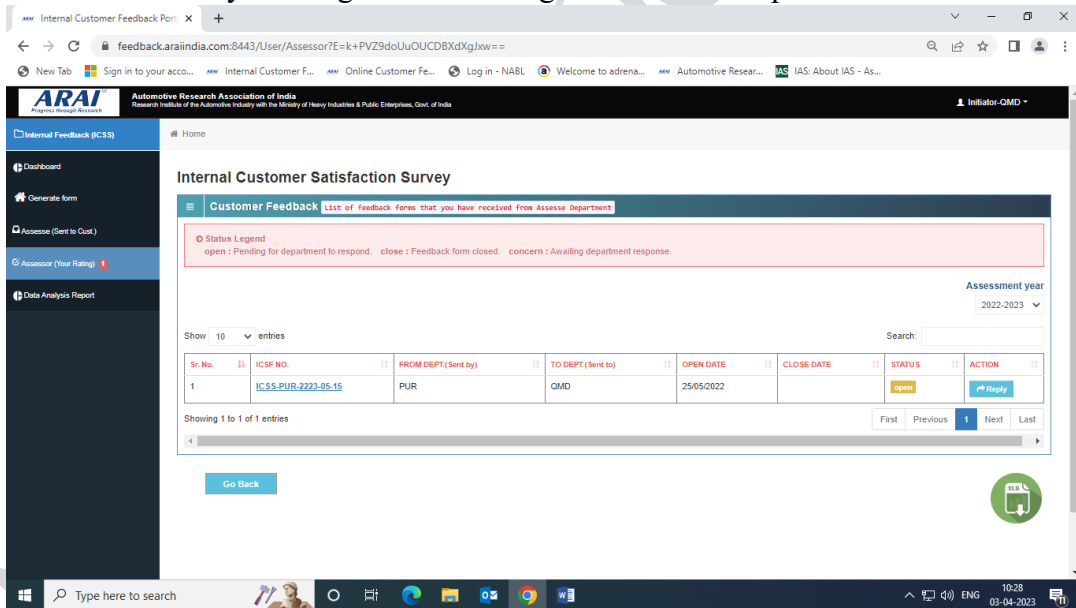
ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025



- j) To see all the feedbacks received by Assessor department, Click “Assessor (Your Rating)”. User can view the list. Assessor can also transfer the data of feedback form into .xls format by clicking the “Excel” sign below search option.



Prepared by

MR

Approved by

DIRECTOR

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

- k) Assessor need to hit on “Reply” button for rating the feedback form. Fill relevant fields and send the form.

Sl. No.	Service Aspect	1	2	3	4	5
101	Availability of staff					
102	Availability of customer service					
103	Availability of the staff					
104	Clarity in communication					
105	Clarity in which your requirements are fulfilled					
106	Clarity in agent's reply					
107	Clarity in staff's reply					
108	Clarity in staff's reply					
109	Clarity in staff's reply					
110	Clarity in staff's reply					
111	Clarity in staff's reply					
112	Clarity in staff's reply					
113	Clarity in staff's reply					
114	Clarity in staff's reply					
115	Clarity in staff's reply					
116	Clarity in staff's reply					
117	Clarity in staff's reply					
118	Clarity in staff's reply					
119	Clarity in staff's reply					
120	Clarity in staff's reply					

- l) An auto generated acknowledgement email is sent to the Assessor after receiving the feedback.
- m) To view the feedback sent by the Assessor, Assesse can click the link “Click here” referred in the email (auto generated).
- n) In case of “Weakness” or “Dissatisfaction”, please fill “Action taken as applicable” and send form by clicking “Response to Assessor”. The auto generated email will be delivered to Assessor.

Sl. No.	Service Aspect	1	2	3	4	5
101	Availability of staff					
102	Availability of customer service					
103	Availability of the staff					
104	Clarity in communication					
105	Clarity in which your requirements are fulfilled					
106	Clarity in agent's reply					
107	Clarity in staff's reply					
108	Clarity in staff's reply					
109	Clarity in staff's reply					
110	Clarity in staff's reply					
111	Clarity in staff's reply					
112	Clarity in staff's reply					
113	Clarity in staff's reply					
114	Clarity in staff's reply					
115	Clarity in staff's reply					
116	Clarity in staff's reply					
117	Clarity in staff's reply					
118	Clarity in staff's reply					
119	Clarity in staff's reply					
120	Clarity in staff's reply					

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025

Internal Customer Feedback Portal

localhost:44333/User/FeedbackFormForAssesse.aspx

Mark a Concern by Functional Department (Received on: 03/01/2020) Average Rating : 8.78

Weakness :
NO

Action taken as applicable :
max 500 charactor valid

Dissatisfaction :
dissatisfied is

Action taken as applicable :
mandatory field
Action on Dissatisfaction

Exit Response TO Assessor Go To Home

© 2019 ARAI (Information Technology Management)

o) Reminder email will also be relayed to the department from the portal in case the action pending.

p) If user forgot the password click on “Forgot Password?” as shown below;

Internal Customer Feedback Portal

feedback.araiindia.com:8443/LoginPage.aspx

ARAI Automotive Research Association of India
Online Customer Satisfaction Survey v2.0

Username

Password

Login

Forgot Password?

Terms of Use Privacy Policy

© Copyright 2023 - ARAI. All rights reserved. Designed & Developed by ARAI

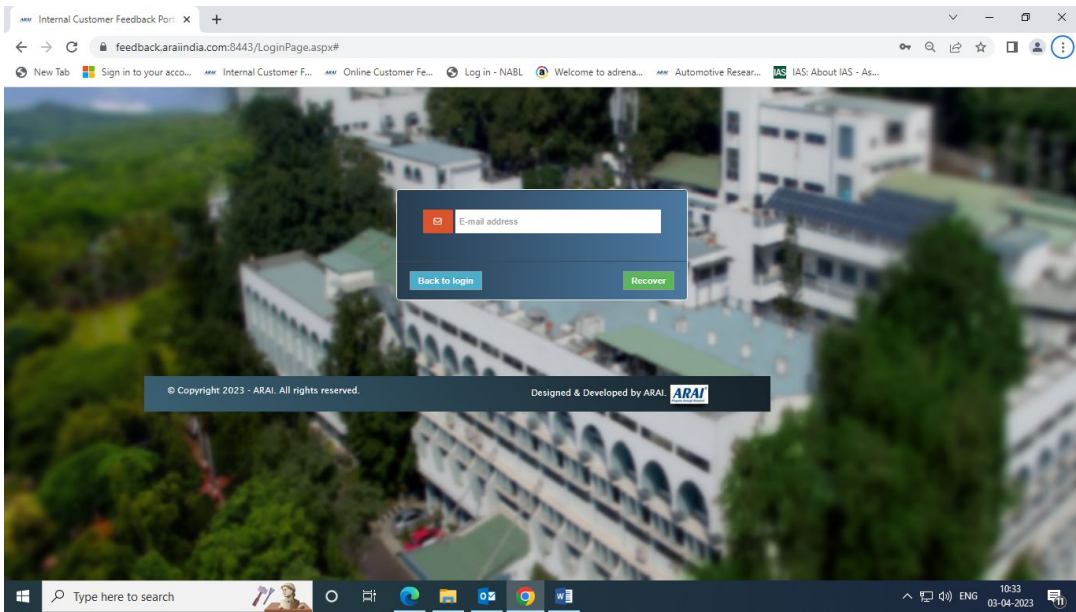
q) Write the email address as shown below to recover the password. The system generated new password will be sent to the prescribed email address.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

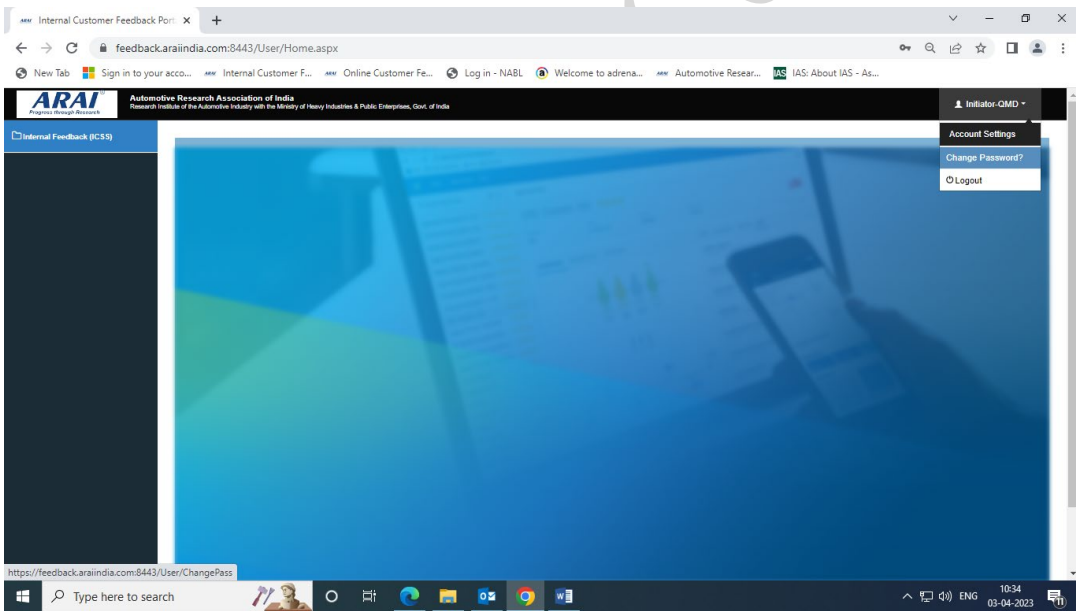
ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025



- r) If user wish to change password, click on ‘Change Password’ at user login credentials as shown below.



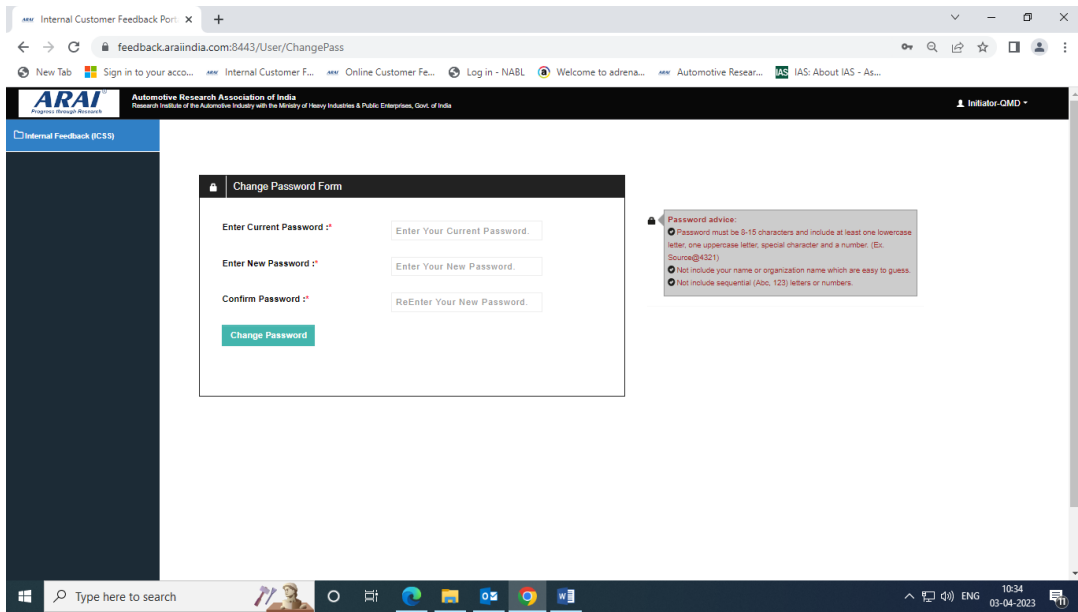
‘Change Password’ will enable user to change his/her existing password for security reasons. Use IT guideling while changing the password “example: Arai@12345”.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Customer Feedback

Version No.05

Version Date: July 17,2025



6.0 Records:

- a) Customer Satisfaction Survey forms
- b) Customer Satisfaction Survey Summary report

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

Applicability:

This Policy shall be known as Policy and Procedure to prevent Sexual Harassment of Women at workplace as framed in accordance with provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder (Hereinafter referred to as "Policy") and shall be applicable to all the employees of The Automotive Research Association of India (hereinafter referred as The Company) employed at the workplace either directly or through any Contractor at the following locations:

- (a) Registered Office, Survey No. 102, Vetal Hill, Off Paud Road, Kothrud, Pune-411038
- (b) Residential Complex, Survey No. 54/7, Mahatma Society, Kothrud, Pune – 411 029
- (c) ARAI – FID, B-16/1, MIDC Chakan, Tal. Khed, Dist. Pune 410 501
- (d) ARAI – HTC, Plot No. E 1/1, MIDC Chakan, Village Nighoje, Mahalunge, Tal. Khed, Dist. Pune 410 501
- (e) ARAI – MRC, Belaj Road, In-front of Soax Flora, Takawe Bk, Tal. Mawal, Dist. Pune
- (f) ARAI Regional Centre South, A 305, Ruby landmark, Mannivakkam, Chennai - 600048
- (g) Regional Centre Bengaluru, Outer Ring Road, No: 58, 15th crossroad, J P Nagar, Jeewan Griha Colony, Bengaluru, Karnataka 560078
- (h) Regional Centre Hyderabad, 7th Floor, Splendid Towers, Begumpet Hyderabad – 500016.

1.0 Preamble:

Sexual Harassment is not only a serious misconduct but is also a criminal offence, which can destroy human dignity and freedom. In an effort to promote the wellbeing of all female employees at the workplace, this Policy envisages as under,

- i) It shall be the duty of the management of the establishment to prevent or deter the commission of any act of sexual harassment at the workplace
- ii) Sexual harassment will be considered as major misconduct and action will be taken on the basis of recommendation of ICC (Internal Complaint Committee) and findings of the Inquiry in this context.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

2.0 Policy:

Policy on Prevention of Sexual Harassment of Women at Workplace is prepared and is available to all employees and displayed at prominent locations.

Refer Annexure 1 below: [ARAI/Policy on Prevention of Sexual Harassment of Women at Workplace](#)

INTERNAL DOCUMENT

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

3.0 Objective:

The company is committed to provide a safe and congenial work environment to its employees, more particularly, women employees and ensure that they are not subjected to sexual harassment. The Company appreciates that such harassment constitutes infringement of fundamental right to work in a safe and healthy environment and with this end in view and keeping in view the provisions of Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules there under, this Policy has been formulated. (Hereinafter referred to as SHWW Act). The said Policy is to define the guidelines and process to be followed in order to provide protection against sexual harassment of women at workplace and prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto. For any doubts or clarifications reference to be made to the SHWW Act the Rules there under.

4.0 References:

4.1 ARAI /Code of Business Conduct and Ethics

5.0 Definitions:

In this Policy unless the context otherwise requires, the words and expressions stated hereunder shall have the following meaning: -

5.1 Complainant Employee (CE): means any female employee as defined under section 2(a) of SHWW Act, who has lodged the complaint of sexual harassment at workplace and has been subjected to any act of sexual harassment by another employee. (hereinafter referred to as Respondent)

5.2 Internal Complaint Committee (ICC): means Committee constituted in accordance with the section 4 of SHWW Act.

6.3 Management: Means Company's managing Director / Manager or such other officer/s or nominee/s as may be authorized in this behalf.

6.4 Respondent Employee (RE): means any employee against whom the complaint of sexual harassment has been lodged.

6.5 Sexual Harassment: means and includes one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

- i) physical contact and advances;
- ii) a demand or request for sexual favours;
- iii) making sexually coloured remarks;
- iv) showing pornography;
- v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

It further includes following amongst other circumstances,

- (a) Verbal/Written: Comments about clothing, personal behavior, or a person's body; sexual or sex-based jokes; requesting sexual favors or repeatedly asking a person out; sexual innuendoes; telling rumors about a person's personal or sexual life; threatening a person, sending emails or text messages of a sexual nature
- (b) Physical: Assault; impeding or blocking movement; inappropriate touching of a person or a person's clothing; kissing, hugging, patting, stroking
- (c) Nonverbal: Looking up and down a person's body; derogatory gestures or facial expressions of a sexual nature; following a person
- (d) Visual: Posters, drawings, pictures, screensavers, emails or text of a sexual nature
- (e) QuidProQuo ("This for that"): A person in a position of authority, typically a supervisor, demands sexual favors as a condition to getting or keeping a job benefit.
 - (i) implied or explicit promise of preferential treatment in the victim's employment;
 - (ii) implied or explicit threat of detrimental treatment in the victim's employment;
 - (iii) implied or explicit threat about the victim's present or future employment status;
 - (iv) interferes with the victim's work or creating an intimidating or offensive or hostile work environment for her and humiliating treatment likely to affect the victim's health or safety.

Prepared by	MR	Approved by	DIRECTOR
--------------------	----	--------------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

(v) humiliating treatment likely to affect her health or safety

Explanation: Although a single unwanted request for a date or one sexually suggestive comment might offend one or be inappropriate, it may not be sexual harassment. However, a number of relatively minor separate incidents may add up to sexual harassment if the incidents affect one's work environment.

6.6 Workplace

As defined under section 2(O) of the SHWW Act and also includes all offices, branches and workshops located anywhere in India. It also includes any place visited by the employee arising out of or during the course of employment including the transportation provided by the Management of the establishment for undertaking the journey.

All other word and expressions not defined herein above shall carry and have same meaning as defined in section 2 of SHWW Act.

7.0 Procedure:

7.1 Internal Complaints Committee (ICC)

Committee shall be constituted in accordance with section 4 of SHWW Act and rules thereunder. It shall comprise of persons as following,

Female Representatives:

- | | |
|----------------------------------|------------------|
| 1. Mrs. S M Bhagwat, GM | Chairperson |
| 2. Mrs. N S Pereira, DGM | Member |
| 3. Mrs. Sneha Pawar, Dy. Manager | Member |
| 4. Mrs. S M Potdar, Dy. Manager | Member Secretary |
| 5. Mrs. Diana Mathews, Engineer | Member |

Male Representatives:

- | | |
|----------------------------|--------|
| 1. Shri. M M Desai, DD | Member |
| 2. Shri. Vikram Tandon, GM | Member |
| 3. Shri. M A Bawase, GM | Member |
| 4. Shri. R D Chaudhari, GM | Member |

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

Every member of the committee shall hold the office for the period of three years from the date of nomination which is 01st November 2026 for above members of the committee.

7.2 Behavioral Zones

Management has categorized individual's actions in three behavioral zones as indicator to create the awareness about the gravity of the act, from amongst other the behaviors encountered at workplace.

GREEN ZONE BEHAVIOR (Acceptable not Sexual Harassment)

- Performance counseling
- Polite touching e.g. on the elbow
- Social interaction
- Showing concern
- Encouragement
- Polite compliment
- Friendly conversation

YELLOW ZONE BEHAVIOR (Use Caution)

- Violating personal "Space"
- Whistling (at someone)
- Questions about personal life
- Posters/calendars
- Off-color jokes
- Leering and staring
- Repeated requests for dates
- Foul language
- Unwanted correspondence/E-mails.
- Suggestive touching, sitting or gesturing

RED ZONE (STOP! Don't do it! Always Considered Sexual Harassment)

- Sexual favors in return for employment rewards
- Threats
- Sexually explicit (pornographic) pictures displayed/E-mails
- Criminal conduct/Sexual assault

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

7.3 Procedure of filing the Complaint

- (a) Complaint should be made by the aggrieved female within the period of 3 months from the date of occurrence of incident and in case of series of incidents, within a period of three months from the date of last incidence. This Complaint by aggrieved female employee shall be made to ICC in writing and be sent either by post or email or given in person to the ICC of the establishment or any officer authorized by ICC in writing.
- (b) The ICC may for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing the complaint within the said period. Where the employee is unable to make the complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may make the complaint. It is however, pertinent to state that if the aggrieved female employee is unable to file the complaint on account of her physical incapacity, complaint may be filed by
- i) Her relative or friend or
 - ii) Her co-worker or
 - iii) An Officer of the National Commission for women or State Women's Commission or
 - iv) Any person who has the knowledge of the incident with the written consent from the aggrieved female employee.

Where the aggrieved female employee is unable to file the complaint on account of her mental incapacity, complaint may be filed by

- i) Her relative or friend or
- ii) A special educator or
- iii) A qualified psychiatrist or the psychologist or
- iv) The guardian or the authority under whose care she is receiving treatment or care or
- v) Any person who has the knowledge of the incident jointly with the relative or a friend or a special educator or a qualified psychiatrist or the psychologist or the guardian or the authority under whose care she is receiving treatment or care.

7.4 Procedure to be followed post receipt of the Complaint

Prepared by	MR	Approved by	DIRECTOR
--------------------	----	--------------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

- a) The ICC would go through the details of the complaint and evaluate if there is prima facie case or not. While doing that, the ICC shall keep in mind that the CE (Complainant Employee) is not subjected to Inquiry more than once. However, the complaint complexity requires that the CE is to be called for more than once, then utmost sensitivity should be displayed and adequate precaution would be taken to ensure that there is no loss of dignity to the CE.
- b) The ICC shall initiate and conduct detailed Inquiry as deemed fit.
- c) The ICC, may before initiating the Inquiry and at the request of the CE, take steps to settle the matter between her and the RE (Respondent Employee) through conciliation, provided that no monetary settlement be made as basis, of conciliation. Where a settlement has been arrived during the conciliation, the ICC shall record the settlement and forward it to the employer and District Officer to take action. However, if the terms arrived during conciliation have not been complied with by the RE, the ICC shall proceed to make an Inquiry into the complaint or as the case may be forward the complaint to police. The copies of the settlement as recorded in the conciliation shall be provided to both parties.
- d) The ICC shall after completing the Inquiry, submit its recommendations to the management with recommendations of the penalty to be imposed.
- e) In case no settlement is arrived the ICC, shall, proceed to make Inquiry into the complaint in accordance with the service rules or the standing orders applicable to the Respondent and where no such rules exist or standing orders do not apply, in accordance with principles of natural justice by giving an opportunity to be heard and provide copies to enable parties to make representation.
- f) The ICC, if finds the RE to be guilty, then may recommend payment of such sums as it may consider appropriate, to the aggrieved female employee, to be recovered from the wages of RE, subject to the provisions of section 15 of SHWW Act.
- g) The ICC shall submit its recommendations upon by completing the Inquiry within three months from the date of receipt of the complaint.
- h) HR/Administration department shall extend full cooperation and support in facilitating to conduct the proceedings by the ICC.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

7.5 Guideline to be kept in mind by ICC while recommending the action

- a) To conduct the Inquiry as per the principle of natural justice and in a confidential manner.
- b) In case where the ICC has recommended to the management for compensation to be made to the CE, then the said amount shall be deducted from the salary of the RE and paid to CE or her legal heir/s
- c) In case the RE fails to pay the sum as referred above, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.
- d) Where the ICC arrives at a conclusion that the allegation against the RE is malicious or the CE has made the false complaint knowing it to be false or the CE has produced forged or misleading document/ **evidence**, it may recommend to the management of the establishment to take action against the CE as stipulated under Section 14 of SHWW Act.
- e) Where the ICC arrives at a conclusion that during the inquiry any witness has given false evidence or produced forged or misleading document it may recommend to the management of the establishment to take appropriate action.

7.6 Management shall ensure

- a) That in case of complaint against any of the members of the ICC, the management shall reconstitute the committee after making due investigation of the complaint. In all such case the guidelines stated hereinabove would be inclusive of the time taken to reconstitute the committee.
- b) The management shall provide assistance to the CE, if she chooses to file the police complaint in relation to the offence under Indian Penal Code or any other law for the time being in force.
- c) The management shall also initiate action under **The Bharatiya Nyaya Sanhita, 2023** or under other law for the time being in force, against the perpetrator, where the perpetrator is not an employee of the establishment and there is a complaint of sexual harassment against the perpetrator in the workplace where the harassment took place.
- d) The management shall direct the HR/Administration department to ensure display at the conspicuous place the guideline as given in section 19 (b) of the SHWW Act.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

- e) The management shall direct and monitor the HR & Administration department to create awareness amongst the employee on sexual harassment policy and the procedure through following amongst other means
 - i) Training cum Awareness session for employees (men and women)
 - II) Training cum Awareness session for ICC members
 - III) Training cum Awareness session for HR team and Senior managers
- f) The management will assist in ensuring the attendance of the RE and witnesses before the ICC as the case may be.
- g) The management shall monitor timely submission of the report. For this it shall conduct periodic update meetings with ICC members and HR & Administration dept. to ensure that the said policy is being implemented in letter and spirit

7.7 Appeal by the aggrieved person

Any person aggrieved by the recommendations made by the ICC inquiring with allegations against the RE has not proved, or the ICC arrived at a conclusion that during Inquiry any witness has given false evidence or produced forged or misleading documents or contravenes the provisions of section 17 of SHWW Act or when the person entrusted with the duty to handle or deal with the complaint, the inquiry or recommendations makes known the contents of the complaint and Inquiry proceedings, or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the service rules applicable to the said person, or where the service rules do not exist then without prejudice to the provisions contained in any other law for the time being in force, the person aggrieved may prefer an appeal. The appeal will lie before Appellate Authority notified under Standing orders.

- 7.8 The Director will ensure an appropriate corrective action on the recommendations of the ICC and keep the CE informed of the same.

Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator, a copy of which, will be maintained in the employee's file.
- Compensation as recommended by the ICC

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the respondent employee found guilty of the offence.
- Lodge a complaint with appropriate legal authority.
- Any other action, solution **as deemed fit**

7.9 Frivolous or Malicious nature of Complaint / Abuse of the process:

In case the complaint is found to be false, frivolous, malicious (making a complaint which is untrue or biased in anyway etc.), the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

7.10 Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the CE/victim's interest in keeping the matter confidential.

To protect the interests of the CE/victim, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

7.11 Access to Reports and Documents:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary, legal or other remedial processes.

7.12 Protection to the Aggrieved Person/Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any such reprisal may become a cause of a separate investigation.

The Company will ensure that victim or witnesses are not victimized or discriminated while dealing with complaints of sexual harassment.

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

7.13 Responsibilities regarding Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that Individual behavior is not contrary to this policy and ensure an environment free from sexual harassment.

7.14 Annual Report

The ICC shall submit annual report to the management outlined in the SHWW Act and it shall be the responsibility of the management to ensure that the said annual report is also filed with District Officer in prescribed format.

INTERNAL DOCUMENT

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ANNEXURE 1

ARAI/Policy on Prevention of Sexual Harassment of Women at Workplace

1. Sexual Harassment is not only a serious misconduct but is also a criminal offence, which can destroy human dignity and freedom. In an effort to promote the wellbeing of all female employees at the workplace, the Management of this Institute has:

- (a) Approved a policy to prevent or deter the commission of any act of sexual harassment at the workplace.
- (b) Constituted an Internal Complaint Committee (ICC) to enquire into all complaints of sexual harassment at workplace.
- (c) Declared sexual harassment as major misconduct and action will be taken on the basis of recommendation of ICC and findings of the Inquiry in this context.
- (d) When an act of sexual harassment constitutes a crime under **The Bharatiya Nyaya Sanhita, 2023** or any other law in force, a complaint will also be lodged with Police Authority against offending employee.

2. Appended below is the extract from Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules, 2014: -

Section 2(n) “Sexual Harassment: means and includes one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- i) physical contact and advances;
- ii) a demand or request for sexual favours;
- iii) making sexually coloured remarks;
- iv) showing pornography;
- v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

3. The undermentioned functionaries of ICC may be contacted by aggrieved female for making complaint of Sexual Harassment: -

- a) Mrs. S M Bhagwat, GM (Chairperson) Tel: **020 - 6762 1591**
- b) Mrs. S M Potdar, Dy. Manager. (Member Secretary) Tel: **020 - 6762 1191**

Director

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Version No.06

Version Date: March 26, 2025

ARAI/Policy on Prevention of Sexual Harassment of Women at Workplace

In our endeavor to promote the wellbeing of all women employees at the workplace, the Management of this Institute is committed:

- To provide a safe and conducive working environment to all female employees at the workplace.
- To consider sexual harassment as major misconduct and take appropriate action to eliminate.
- To constitute and surveil the Internal Complaint Committee (ICC) as per the provisions in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules, 2014.
- As per this policy based on investigation-
 - Respondent is liable to punishment / penalties, which may include termination of services.
 - A malicious complaint by a woman will attract the same punishment, as prescribed for a man found guilty of an offence under the Act.

Director

Prepared by	MR	Approved by	DIRECTOR
-------------	----	-------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

1.1 Preface and objective:

The Automotive Research Association of India (ARAI) believes working in transparent & fairest manner by adopting highest standards of honesty, integrity and ethical behavior. Code of Business Conduct & Ethics (CBCE) designed by ARAI is applicable to all its employees. It lays down the principles and standards that govern the actions of the employees. Any actual or potential violation/deviation of these codes, howsoever insignificant or perceived as such, would be a matter of concern for ARAI. The role of the employees in pointing out such violations cannot be undermined.

An employee, who becomes aware of any existing or potential violation of this Code, is required to notify it to the ARAI management (Ethics Officer), who will decide to report it to ARAI's Vigilance Committee or otherwise, based on the Principles laid down herein. Failure to do so by the employee is itself a violation of this Code. To encourage reporting of violations, ARAI will not retaliate, or permit retaliation, for reports made in good faith.

The Vigil Mechanism and Whistle Blower Policy is an extension of the CBCE adopted by the ARAI to provide a secure and confidential channel of communication for its employees, supervisors, managers, senior management, suppliers or customers to disclose any improper practices that are taking place anywhere in the ARAI enabling corrective action.

The policy addresses the following relevant issues:

- Process of disclosing any improper practice taking place in the ARAI
- Mechanism for processing of such disclosures & consequent action
- Protection made available to the whistle blower/s

Accordingly, this Vigil Mechanism and Whistle Blower Policy ("the Policy") has been formulated to provide a mechanism for employees of ARAI to approach the Ethics Officer of ARAI.

1.2 Definitions:

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

- **'ARAI Code'** means the Code of Business Conduct & Ethics of ARAI (CBCE).
- **'Complaints'** means any information received (which includes anonymous information), from any source, about corruption, malpractice, misconduct or any other improper practice on the part of an employee of ARAI.
- **'Chief Vigilance Officer'** is the Officer appointed under The Central Vigilance Commission Act, 2003 (as amended).
- **'Employee'** means every permanent employee on the roll of ARAI including Director-ARAI.
- **'Ethics Officer'** means to whom the complaint is reported for the first time by the Whistle Blower under this policy. Director – ARAI shall be the Ethics Officer.
- **'FIAC'** means the Finance and Internal Audit Committee of ARAI.

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

- **'Investigators'** generally would mean Vigilance Committee Members and/or those authorized, appointed, consulted, referred or approached by the Vigilance Committee. It also includes ARAI auditors and the Police.
- **'Protected Disclosure'** means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity:

Exceptions: Following types of Disclosures may not be treated as 'Protected' and ARAI or the Vigilance Committee, as the case may be, will at their sole discretion decide whether to act on them:

- Verbal Disclosures
 - Disclosures though in writing but are vague, unclear and ambiguous in nature, not supported by any facts, figures or reasons
 - Disclosures not in legible handwriting
 - Disclosures in languages other than English, Hindi or regional language of the place of employment of the Whistle Blower
 - Anonymous Disclosures or Disclosures hiding the real identity i.e. made in fake name/s
- **'Respondent'** means a person or person(s) against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.
 - **'Vigilance Committee'** or the Committee, means a Committee constituted by Director – ARAI for dealing with Protected Disclosures /Reports/Complaints ("Disclosure/s") received from Whistle Blowers (through Ethics Officer), making enquiries and / or investigation on the Disclosures and recommending its findings / appropriate action to the Management for closure / disposal of such Disclosures. HR Head of the ARAI shall mandatorily be one of the member of this Committee and shall act as Ethics Counselor.
 - **'Whistle Blower'** means and include an Employee/Customer/Suppliers making a Protected Disclosure under this Policy.

For better readability, the masculine form has been chosen throughout. This refers, of course, generally to both female and male persons.

1.3 Scope:

- This Policy is an extension of the ARAI CBCE. The Whistle Blower's role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.
- Whistle Blowers should not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Vigilance Committee or the Investigators.
- Protected Disclosure will be appropriately dealt with by the Vigilance Committee.

The following acts that are indicative in nature, on the part of employees shall invite Vigilance investigation:

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

- Demanding and / or accepting gratification other than legal remuneration in respect of an official act or for using his influence with any other official.
- Obtaining valuables, without paying or making inadequate payment from a person with whom he has or is likely to have official dealings or his subordinates have official dealings or where he can exert influence.
- Obtaining for himself or for any other person any valuable thing or pecuniary advantage by corrupt or illegal means or by abusing his position as an employee.
- Possession of assets disproportionate to his known sources of income.
- Cases of misappropriation, forgery or cheating or other similar criminal offences.
- Criminal breach of trust
- Cash shortage
- Negligence
- Cheating
- Engaging in any trade or business outside the scope of the employment without the consent of the appropriate authority
- Unauthorized disclosure of information regarding the affairs of ARAI or any of its customers or any other person connected with the business of ARAI which is confidential or the disclosure of which would be prejudicial to the interest of ARAI.
- Drunkenness or riotous or disorderly behaviour or indulgence in betting or gambling or speculation that would affect the image of ARAI
- Willful damage or attempt to cause damage to the property of ARAI
- Abetment or instigation of any act that would be prejudicial to the interest of ARAI
- Misuse of power / abuse of authority
- Fraud of any nature
- Unethical professional conduct
- Engaging in any antinational activities
- Money laundering
- Other cases of probable irregularities shall include:
 - Gross or willful negligence;
 - Recklessness in decision making;
 - Blatant violations of systems and procedures;
 - Exercise of discretion in excess, where no ostensible organizational interest is evident;
 - Failure to keep the controlling authority / superiors informed in time

1.4 Eligibility:

All Employees of the ARAI are eligible to make Protected Disclosures under the Policy. The Protected Disclosures shall be in relation to matters concerning the ARAI.

1.5 Disqualifications:

- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

- Protection under this Policy shall not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.
- Whistle Blowers, when found making frivolous, baseless, malicious Protected Disclosures with mala fide intentions or otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy. In respect of such Whistle Blowers, the ARAI's Vigilance Committee reserves its right to take/recommend appropriate action.

1.6 Procedure:

- All Protected Disclosures should be addressed to the Ethics Officer (Director) of the ARAI.
- Protected Disclosures should be in writing to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower.
- The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the Whistle Blower. Ethics Officer of the ARAI shall detach the covering letter and discuss the Protected Disclosure with Members of the Vigilance committee for investigating the matter or otherwise.
- Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.
- The Whistle Blower must disclose his identity in the covering letter forwarding such Protected Disclosure. Also, if required, the Whistle Blower will make himself available for any discussion relating to the Protected Disclosure and help the process of investigation.
- Normally anonymous Disclosure may not be entertained under this Policy and the Vigilance Committee will not act upon any anonymous Disclosures unless Ethics Officer may recommend such investigation depending upon the gravity of the issue involved. The Ethics Officer shall note down the reasons for such recommendation or otherwise with reasonable justification..
- The Whistle Blower shall submit adequate & proper documentary proof in support of his Disclosure (wherever required) and specify the name of the employee who is ready to act as witness for the Disclosure.
- Vigilance Committee shall consider whether allegations are true and the accuracy of facts, while determining the Disclosure.

1.7 Investigation:

- All Protected Disclosures reported under this Policy will be thoroughly investigated by the Vigilance Committee. The Committee may, in consultation with the Ethics Officer, if necessary decide to refer the disclosure or essential part of it to the Legal Head of the ARAI and seek necessary advice.

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

- Protected Disclosures involving or relating to the Ethics Counselor (HR Head of ARAI) or any other Member of the Vigilance Committee, which in the opinion of the Ethics Officer may hamper the independence of the Vigilance Committee in conducting the investigation will be investigated by the Ethics Officer either by himself or through remaining members of the Vigilance Committee or other investigators.
- Protected Disclosures involving or relating to the Ethics Officer himself, needs to be reported to the Chairman of the FIAC, who will issue appropriate instructions w.r.t. investigation or otherwise, as per the principles laid down in this policy.
- The Committee may at its discretion, consider involving any other Investigators for the purpose of investigation.
- The decision to conduct an investigation is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may not support the conclusion of the Whistle Blower that an improper or unethical act was committed.
- The identity of a Respondent will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- Respondents...
 - will be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation. Principles of natural justice shall be followed.
 - shall have a duty to co-operate with the Vigilance Committee or any of the Investigators during investigation to the extent that such co-operation sought, does not merely require them to admit guilt.
 - have a right to consult with a person or persons of their choice, other than the Committee /Investigators and/or Ethics Officer and/or the Whistle Blower.
 - shall be free at any time to engage a counsel at his own cost to represent them in the investigation proceedings.
 - have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the Respondents.
 - will be given the opportunity to respond to material findings contained in an investigation report unless there are compelling reasons not to do so. No allegation of wrongdoing against a Respondent shall be considered as maintainable unless there is good evidence in support of the allegation.
 - have a right to be informed of the outcome of the investigation. If allegations are not sustained, the Respondent should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Respondent and the ARAI.
- The investigation shall be completed within 90 days of the receipt of the Protected Disclosure. However, the same can be extended to another 30 days with reasonable justification. But in any case the investigation shall not exceed 120 days.

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

1.8 Protection:

- No unfair treatment will be meted out to a Whistle Blower by virtue of his having reported a Protected Disclosure under this Policy. ARAI, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice against Whistle Blowers. Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, physical harm, social isolation or the like, including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Protected Disclosure. ARAI will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the ARAI will arrange for the Whistle Blower to receive advice about the procedure, etc.
- The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. Whistle Blowers are cautioned that their identity may become known for reasons outside the control of the Vigilance Committee (e.g. during investigations carried out by Investigators).
- Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

1.9 Investigators:

- Investigators are required for fact-finding and analysis. Investigators shall derive their authority and access rights from the Committee during the course and scope of their investigation.
- Technical and other resources may be drawn upon, as necessary to augment the investigation. All Investigators shall be independent and unbiased. Investigators have a duty of fairness, objectivity, thoroughness, ethical behavior, and observance of legal and professional standards.
- Investigations will be launched only after a preliminary review which establishes that:
 - the alleged act constitutes an improper or unethical activity or conduct, and
 - the allegation is supported by information specific enough to be investigated,
 - matters that do not meet these criteria may be worthy of management review, but investigation itself should not be undertaken as an investigation of an improper or unethical activity.

1.10 Decision:

If an investigation leads the Vigilance Committee to conclude that an improper or unethical act has been committed, it shall recommend such disciplinary or corrective action as it deems fit to the Ethics Officer, who will take the final decision. It is clarified that any disciplinary or corrective action initiated against the Respondent as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------

ARAI/Vigil Mechanism and Whistle Blower Policy

Version No.: 02

Version Date: July 20, 2022

1.11 Reporting:

- The Vigilance Committee shall submit a report to the Ethics Officer on a quarterly basis (including a 'nil' report) about all Protected Disclosures referred to it together with the results of investigations, if any.
- The Ethics Officer will in his discretion decide about briefing the cases to FIAC depending upon the gravity of the matter.
- The Vigilance Committee, through the Chief Vigilance Officer of ARAI will report such incidences to the concerned authorities i.e. Central Vigilance Commission, Central Government reporting authorities etc.

1.12 Retention of documents:

All Protected Disclosures along with the results of investigation relating thereto shall be retained by the ARAI for a minimum period of seven years.

1.13 Amendment:

ARAI reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees unless the same is notified to the Employees in writing.

Prepared by	Chief Vigilance Officer	Approved by	Director
--------------------	-------------------------	--------------------	----------