



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 1 of 8

1.0 Introduction:

This whistle-blower policy ensures that all employees have free access to appropriate management levels for bringing up any actual or potential issue/s which has/ have violated or potentially violates our policies or the local laws/industry code of conduct in **CEV Engineering Pvt. Ltd.** (hereinafter referred to as the “Company/CEV”). This policy in the appropriate way to follow our values and protect the reputation of the Company.

Reports made in good faith must be based on a reasonable belief that a Wrong doing has occurred or is likely to occur. If a subsequent investigation reveals that there was no Wrongdoing the employee making the report would not be subjected to any victimization or disciplinary action if he/she had acted in good faith.

2.0 Objective

The objective of this Whistleblower Policy is to:

- Encourage employees and other stakeholders to report unethical practices or violations of company policies/laws.
- Provide a transparent grievance mechanism for reporting.
- Ensure that concerns are handled with confidentiality, fairness, and without fear of retaliation.

3.0 Scope:

This policy applies to:

- All employees (permanent, contractual, trainees, interns)
- Suppliers, contractors, consultants, customers, other stakeholders and any other person associated with CEV.

All reported incidents will be taken seriously, investigated promptly, and addressed fairly.

4.0 Definitions:

- **Whistleblower:** Any individual who reports a suspected wrongdoing or unethical conduct in good faith.
- **Good Faith:** Belief that the information provided is true to the best of the whistleblower’s knowledge, even if it later proves to be unsubstantiated.
- **Retaliation:** Any adverse action taken against a whistleblower as a result of their report.
- **Ombudsperson:** An independent person or committee responsible for receiving and investigating whistleblower complaints.



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 2 of 8

5.0 Concern Reporting:

5.1 Principle of Reporting:

If a CEV employee believes in good faith that a rule or one of the principles laid down in CEV' Code of conduct & Business Ethics and policies has been or is about to be violated, he or she should inform his or her superior concerns regarding possible illegal act or ethical violation. When in doubt whether an activity or behaviour is a violation or not, employee should report the same.

5.2 What to Report

Below are few examples though non-exhaustive of the areas where non-compliance may be reported:

- Harassment or Discrimination & Workplace Violence
- Protection of Confidential Information and intellectual property
- Information Security breach
- Human right issues (Child labor, Freedom of association, forced labor, or human trafficking)
- Fraud or questionable accounting/financial reporting
- Corruption, Bribery and improper transactions
- Improper promotion and improper sales practices
- Conflicts of Interest
- Environmental Health and Safety issues
- Insider Trading
- Worker Concerns & human right abuses by Security persons
- Anti-competitive behaviour
- Theft, misuse of company's assets
- Retaliatory action as mentioned in this policy
- Any Illegal or unethical Practices

5.3 Channels of Raising Concerns

Employees of CEV are free to choose the reporting channel

Primary Reporting Channels: Individuals are encouraged to report concerns through the designated reporting channels, which may include:

- **Hotline:** +91 95994 43631
- **Email:** hckim@knc-korea.com
- **Company Portal:**

A secure web-based platform accessible at <https://cev-india.com/whistle-blower-reporting/> where whistleblowers can submit reports confidentially or anonymously.



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 3 of 8

Alternative Channels: In cases where an individual feels uncomfortable reporting directly through the primary channels, they may report to their immediate supervisor, a member of the Human Resources department, or any member of the leadership team.

All HR related complaints received should be forwarded to Director for action. In case, where concern is raised with deliberate and/or ill motive to tarnish the reputation of employee/s and department/s of the Company, the person raising such concern will undergo the investigation process and disciplinary action.

5.4. Confidentiality

All reports will be treated confidentially to the fullest extent possible. Identities of whistleblowers will only be disclosed to authorized personnel involved in the investigation unless required by law. The identity of the whistleblower shall be kept confidential at all times. Only the designated grievance handling team (e.g., Ethics Committee) will have access to whistleblower identity if disclosed. All documents and records will be stored securely, accessible only to authorized personnel.

5.5. Investigation Process

Step	Description	Timeline
Step 1: Reporting the Case	Whistleblower submits grievance via email, online form, hotline, or suggestion box. Can be anonymous.	Anytime
Step 2: Acknowledgment	Ombudsperson acknowledges receipt (unless anonymous).	Within 3 working days
Step 3: Preliminary Review	Initial assessment to determine if it falls within the scope of this policy.	Within 5 working days
Step 4: Investigation	Detailed review conducted by Internal Audit or Ethics Committee. Includes evidence collection, interviews, and documentation.	Within 30 working days (can extend by 15 days with justification)
Step 5: Outcome & Findings	Investigation findings reviewed. Action taken if allegations are substantiated.	Within 5 working days after investigation
Step 6: Action & Communication	Outcome communicated to whistleblower (if identity known).	Within 5 working days of resolution



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 4 of 8

Step 1: Reporting the Case

The whistleblower submits their report via one of the designated channels (e.g., email, telephonic).

Step 2: Acknowledge Receipt:

The organization acknowledges receipt of the report within a set timeframe (e.g., 3-5 business days). This confirmation is sent to reassure the whistleblower that their report has been received and is being processed.

Step 3: Preliminary Assessment

1. **Assign Investigator:** A compliance officer or member of the Ethics Committee reviews the report and assigns an investigator to determine if the report has enough detail and falls within the scope of the policy.
2. **Determine Scope:** The investigator assesses the nature of the report, its potential impact, and the required resources to conduct a thorough investigation.
3. **Prioritize the Case:** Based on the seriousness and urgency, the case is classified (e.g., high, medium, or low priority).

Step 4: Investigation

1. **Gather Evidence:** The investigator collects relevant documents, interviews witnesses, and gathers any other evidence related to the case.
2. **Protect Confidentiality:** Throughout the investigation, the whistleblower's identity and any sensitive details are kept confidential to the fullest extent possible.
3. **Periodic Updates:** If feasible, periodic updates are provided to the whistleblower, particularly if the investigation extends beyond an expected timeframe.

Step 5: Outcome & Findings

1. **Evaluate Evidence:** The investigator reviews all collected evidence to identify whether the report's claims are substantiated.
2. **Draft Investigation Report:** A comprehensive report is prepared, outlining the findings, conclusions, and recommendations. This includes:
 - A summary of the allegations
 - A description of the investigation process
 - Details of evidence gathered
 - Conclusions and findings
 - Recommended corrective actions, if any
3. **Review by Ethics/Compliance Committee:** The investigation report is submitted to the



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 5 of 8

Ethics or Compliance Committee for review and approval.

Step 6: Action and Communication

1. **Implement Corrective Actions:** If the findings substantiate the allegations, the organization takes corrective action. This may involve:
 - o Disciplinary measures (e.g., termination, suspension, or training)
 - o Policy or procedural changes
 - o Remediation to affected parties
2. **Notify the Whistleblower:** Once the case has been resolved, the whistleblower is notified of the case closure and, where appropriate, informed of the actions taken, respecting confidentiality constraints.
3. **Address Retaliation Risks:** Measures are put in place to protect the whistleblower from potential retaliation. This includes monitoring the whistleblower's work environment and any changes in their role or treatment post-reporting.

Step 7: Case Closure

1. **Document Case Closure:** The case is formally closed, and all investigation documentation is securely filed, with access limited to authorized personnel.
2. **Record Retention:** All records are retained according to organizational policy (e.g., for 5 years), ensuring they are available if needed for future reference or audits.

6. Management Assurance

6.1. Identity of the Complainant

Top Management and employees are encouraged to report the incident by identifying themselves. Such identification helps the investigation process. In case the complainant decides not to disclose his/her identity, an ANONYMOUS report can be submitted. It is the responsibility of each person to report an incident regardless of the choice of disclosing or not disclosing his/ her identity. The identity of the complainant will be kept confidential if asked to do so and will be disclosed only if it becomes necessary for investigation purposes or in certain circumstances where it is legally required to be so disclosed

6.2. Protection from Retaliation

CEV strictly prohibits retaliation against any individual who reports misconduct in good faith. Retaliation includes, but is not limited to, dismissal, demotion, discrimination, or harassment. Any person found to be retaliating against a whistleblower will face disciplinary action, up to and including termination.



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 6 of 8

CEV assures that there will be no retaliatory action against any person who has reported any incident of non-compliance in good faith, using any appropriate channel of communication as provided for in this policy.

6.3 Report to Committee

The members of the Ethics Committee are

Name	Job Title	Email
Young Jin Kim	Managing Director	youngjinkim@knc-korea.com
H C Kim	General Manager – Production	hckim@knc-korea.com
S K Park	General Manager - HR	skpark@knc-korea.com
Ashok	HR Manager	ashok@knc-korea.com

A quarterly report will be submitted to the Committee by the HR on the number of complaints received in the preceding quarter, action taken on the complaints and results of investigations, if carried out.

6.4 Anonymous Complaints

Whistleblowers may submit concerns anonymously through:

- A secure web form with no identity fields
- Anonymous email
- Physical drop box at office premises

7. Appeal Process

Anonymous complaints must include sufficient detail to enable an effective investigation.

If the whistleblower is dissatisfied with the investigation outcome, they may submit a written appeal to:

- Ethics Committee Chairperson
- HR Head (for internal employees)
- External Ombudsperson (if appointed)

Appeal must be submitted within 15 calendar days of receiving the resolution.

Appeals will be resolved within 20 working days, with a final binding decision.

8.0 Remedial Procedures

a) Proportionality

- Corrective action shall be proportionate to the severity of violation:
 - a. Minor violations → Verbal/written warning, counseling, retraining.
 - b. Moderate violations → Suspension, financial penalties, demotion, recovery of loss.
 - c. Severe violations (fraud, harassment, corruption) → Termination, legal action, blacklisting vendors.
- Emphasis will be placed on prevention and capacity-building, not only punitive measures.

b) Transparency

- Outcomes of whistleblower cases (without revealing identities) will be periodically shared with:
 - a. Audit Committee and Board of Directors.
 - b. Relevant stakeholders through internal newsletters or annual sustainability/CSR/ESG reports (aggregated and anonymized).
- Whistleblower will be informed of the closure of the complaint and broad remedial actions taken.

c) Monitoring

- Effectiveness of remedies will be monitored through:
 - a. Follow-up audits to ensure non-recurrence.
 - b. Regular review of policy effectiveness by the Audit Committee.
 - c. Trend analysis of complaints (number, type, resolution time).
- An annual Whistleblower Effectiveness Report will be presented to the Board.

9.0 Evaluation of Grievance Mechanism Effectiveness

The effectiveness of the grievance redressal mechanism will be monitored through:

- Quarterly reviews of case closure timelines and resolution effectiveness
- Annual audit of the whistleblower mechanism by Internal Audit or an external third party
- Whistleblower satisfaction survey (optional and anonymous)
- Tracking metrics such as:
 - i. Number of complaints received
 - ii. Resolution rate
 - iii. Timeliness of closure
 - iv. Repeat grievances



WHISTLE BLOWER POLICY

REF : CEV/Policy/WB

ISSUE : A/02.01.2024

REV: 01/02.01.2024

Page 8 of 8

v. Retaliation incidents reported

Findings will be reported to the Board Audit Committee or appropriate governance body annually for review and recommendations.

10. Policy Communication

- The policy will be made available on the company website, intranet and displayed in noticeboard.
- All employees will receive annual training on their rights and the grievance process.
- Suppliers and contractors will be informed through contractual clauses and onboarding documents.

11. Amendments to the Code

The provisions of this Code can be amended/ modified by the Managing Director of the Company from time to time and all such amendments/ modifications shall take effect from the date stated therein.

Young Jin Kim
Managing Director

Effective Date: 02.01.2024