

Alfa Laval (India) Limited Whistle Blower Policy	Effective from:	16-02-2015
	Issued by:	HR/Anita Panakkal
	Approved by:	MGMT/Lars Dithmer

Alfa Laval India Limited expects employees and Business Associates\* to report breaches, or suspected breaches of the law, Alfa Laval Business Principles, policies and/or any violation of Alfa Laval Code of Conduct.

(\* Business Associates: People with whom Alfa Laval has a business or community relationship or stakeholder relationship are encouraged to speak up and to report any observed violations of the law, Alfa Laval Business Principles, policies or Alfa Laval Code of Conduct.)

### Employees:

Employees are expected to speak up and to report any suspected or observed violations of the law, Alfa Laval Business Principles, Policies, Alfa Laval Code of Conduct or if they are asked to do something that might be a violation.

Alfa Laval will take all reasonable steps to protect any employees (so-called "whistle blowers") who report suspected breaches of Alfa Laval Business Principles and violation of Alfa Laval Code of Conduct.

Illustrative list of reportable violations are as follows: - (Refer **Annexure A** hereto for details)

- Fraud
- Corruption
- Violation to Code of conduct and Business Principles
- Harassment
- Unethical/improper conduct
- Violation of law
- Misappropriation and impropriety
- Mis-statement of financials
- Conflict of interest
- Abuse of authority

Any employee/business associate whistle blower observing any breaches or violation as above, may file his/her concerns as under:

- 1) Email to [whistleblower.india@alfalaval.com](mailto:whistleblower.india@alfalaval.com) OR [whistleblower@alfalaval.com](mailto:whistleblower@alfalaval.com)
- 2) File complaint using Whistle blower link: <http://inpows0017/WhistleBlower/>
- 3) Report to Chairman of Audit Committee at [henrik.holm@alfalaval.com](mailto:henrik.holm@alfalaval.com)
- 4) Mikael Wahlgren (Group General Counsel) on +46 46 36 72 20/[mikael.wahlgren@alfalaval.com](mailto:mikael.wahlgren@alfalaval.com) or Peter Bailliere (Group HR Director) on +46 46 36 71 00/[peter.bailliere@alfalaval.com](mailto:peter.bailliere@alfalaval.com)

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Employee/Business Associates may also file anonymous complaints, though however, Alfa Laval encourages its employee/Business Associates to be transparent and file their complaints disclosing their identity.

Alfa Laval commits to handle promptly and appropriately all concerns received from the whistle blower under this Policy. All information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. The process for handling a reported complaint is stated in **Annexure B**.

Every employee has a duty to co-operate in the investigation. Failure to co-operate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action.

If on conclusion of its investigation, Alfa Laval determines that a violation has occurred, Alfa Laval will take effective remedial action commensurate with the nature of the offence.

**Whistleblower Protection:**

Every Whistle Blower filing his/her concerns in good faith is protected under this policy. Alfa Laval may not take any adverse action against an employee for filing a concern, participating or assisting in an investigation. Alfa Laval will do its utmost to preserve the whistle blower's anonymity if requested for.

Incidents of retaliation against a whistle blower will result in disciplinary action, up to and including termination against anyone responsible for such action.

Any person intentionally filing a false complaint will not be protected under this policy.

The Managing Director has the responsibility to ensure that no employee will suffer as a consequence of bringing to the attention of the Management, a breach or suspected breach of Alfa Laval Business Principles or Alfa Laval Code of Conduct or any violation of law.

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#### Annexure A – Detailed list of reportable violations

SI No.	Violations	Definition of Violations
1	Abuse of or fraud with Company Benefits	Improper, misleading or deceptive actions taken, falsification of records, or misrepresentation of physical conditions related to benefits plans including health, supplemental income plans, short and long term disability, tuition reimbursement, credit card, travel claims and sick or other paid time off programs.
2	Computer Abuse	Inappropriate material contained, inappropriate usage, inappropriate website accessed, compromised access code, inappropriate use of Company resource or computer.
3	Misuse of Confidential Information	Inappropriate sharing or misuse of Confidential Information.
4	Fraud Asset Misappropriations	The individual steals or misuses an organization's assets (common examples include skimming revenues, stealing inventory, and payroll fraud)
5	Fraud Corruption	The individual wrongfully uses his influence in a business transaction to procure some benefit for himself or another person contrary to his duty to his employer or the rights of another (common examples include accepting kickbacks, and engaging in conflicts of interest).
6	Financial Fraud	An individual falsifies an organization's financial statements (common examples include overstating revenues, and understating liabilities or expenses)
7	Improper giving and receiving of Gift	The giving, receiving or solicitation of items which could be reasonably interpreted as an effort to influence a business relationship or decision; items given, received or solicited for the benefit of an individual or an individuals family or friends; items given, received or solicited during or in connection with contract negotiations; the acceptance of cash, checks, money orders, vouchers, gift certificates, loans, stocks or stock options.

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SI No.	Allegation	Definition of Allegation
8	Improper supplier activity	Supplier or contractor activity in violation of corporate policies and procedures; improper supplier or contractor selection based on personal gain, improper negotiation or diversion of contract awards.
9	Other Policy Violations	Violation to other corporate policies (Non-HR)
10	Theft	The act of stealing; specifically: the felonious taking and removing of Company and/or personal property with intent to deprive the rightful owner of it
11	Unsafe Working Conditions	Failure of meeting requirements needed to perform all duties in a secure environment. Potential areas of harm. (Examples include: environmental damage, OSHA, EPA, supervisor directive, poor housekeeping)  Non-compliance to Safety Accountability Policy
12	Violence or Threat	A violent act or an expression of the intention to inflict evil, injury, or damage to a person or their property. (Examples include: direct, veiled, conditional, violent)
13	Sabotage or Destruction of Property	Intentional or Unintentional destruction of property (employer's, employee's, or other's) or the hindering of manufacturing by discontented workers (Examples include: Equipment destruction, stealing, work slowdown, computer virus)
14	Prejudice/Bias/Discrimination	Using symbols, words, or engaging in activities that may reasonably be perceived as demeaning or showing hostility or aversion to an individual because of the individual's race, color, religion, gender, national origin, age, disability, sexual orientation, or because of the status of the individual's relatives, friends, or associates.

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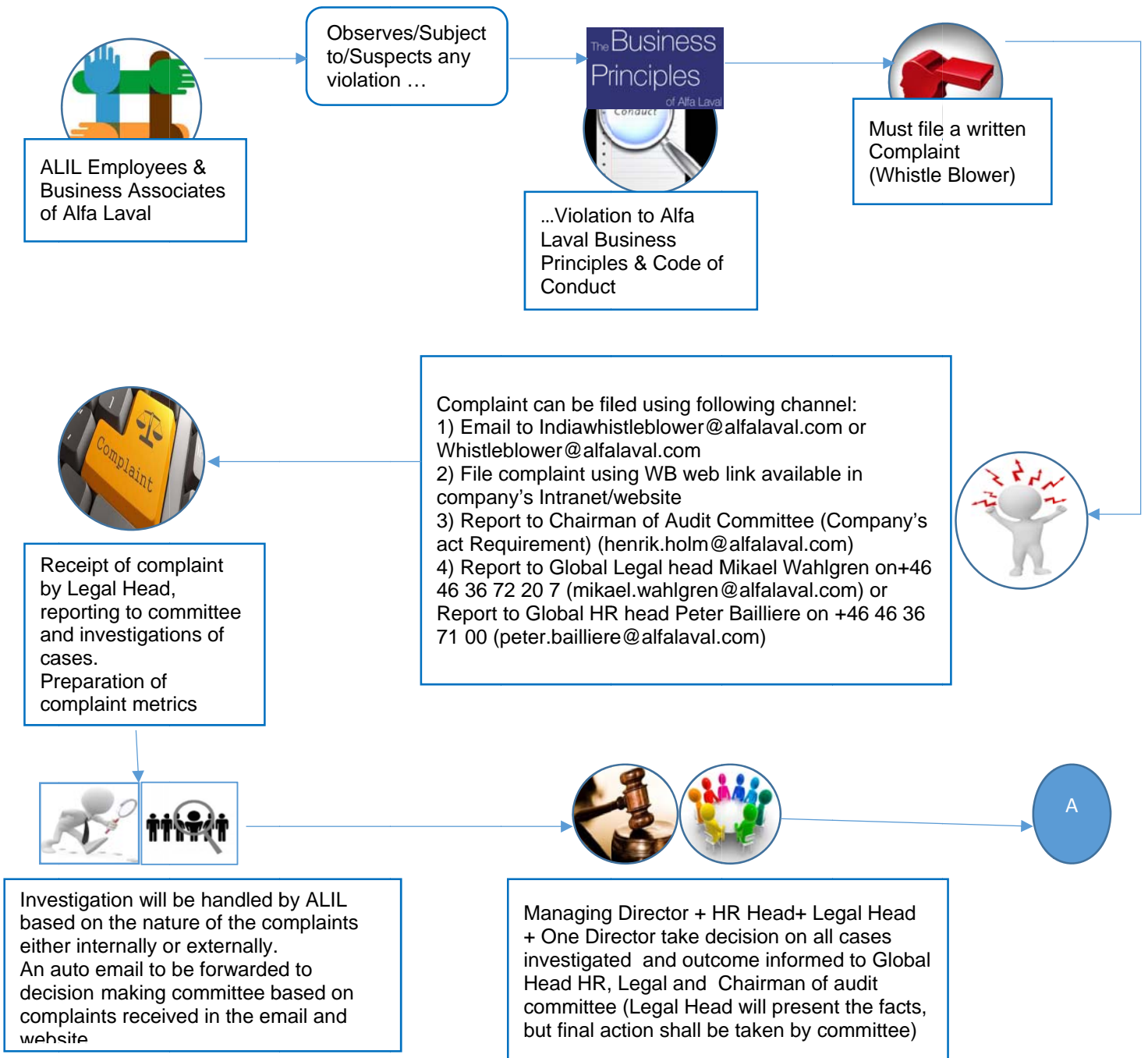
SI No.	Allegation	Definition of Allegation
15	Harassment - Non Discrimination	To torment. To pursue someone relentlessly. To stalk someone. To annoy someone continually (Examples include: continual playing of annoying jokes, manipulation of work area, constantly putting someone down)
16	Sexual Harassment	The making of unwanted and offensive sexual advances or of sexually offensive materials, remarks or acts (Examples include: unwelcome touching; derogatory slang/tone of a sexual nature; symbols, words, or graffiti that have sexual connotations; or pictures, drawing, or cartoons with sexual meaning or tone).
17	Substance Abuse	Substance abuse is defined as the misuse of both legal and illegal drugs including alcohol on Company premises and on external sites where the Company engages in installation, service, commissioning or similar such activity
18	Time Abuse	Concerns about an employee or manager who is falsifying his/her work hours.
19	Wrongful Discipline or Discharge	Discipline has been administered that is not fair or appropriate.
20	Dual Employment	Dual employment occurs when an employee holds two (2) or more paid positions (primary and secondary) with any other organization or carries on any personal business during their course of employment with the Company.
21	Conflict of interest	Employee position where individual interest conflicts with interest of the Company. A conflict of interest is a set of circumstances that creates a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest
22	Non-compliance to terms of employment	Employee does not comply to agreed terms of employment of the Company

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**Annexure B**

**Process Flow Chart**



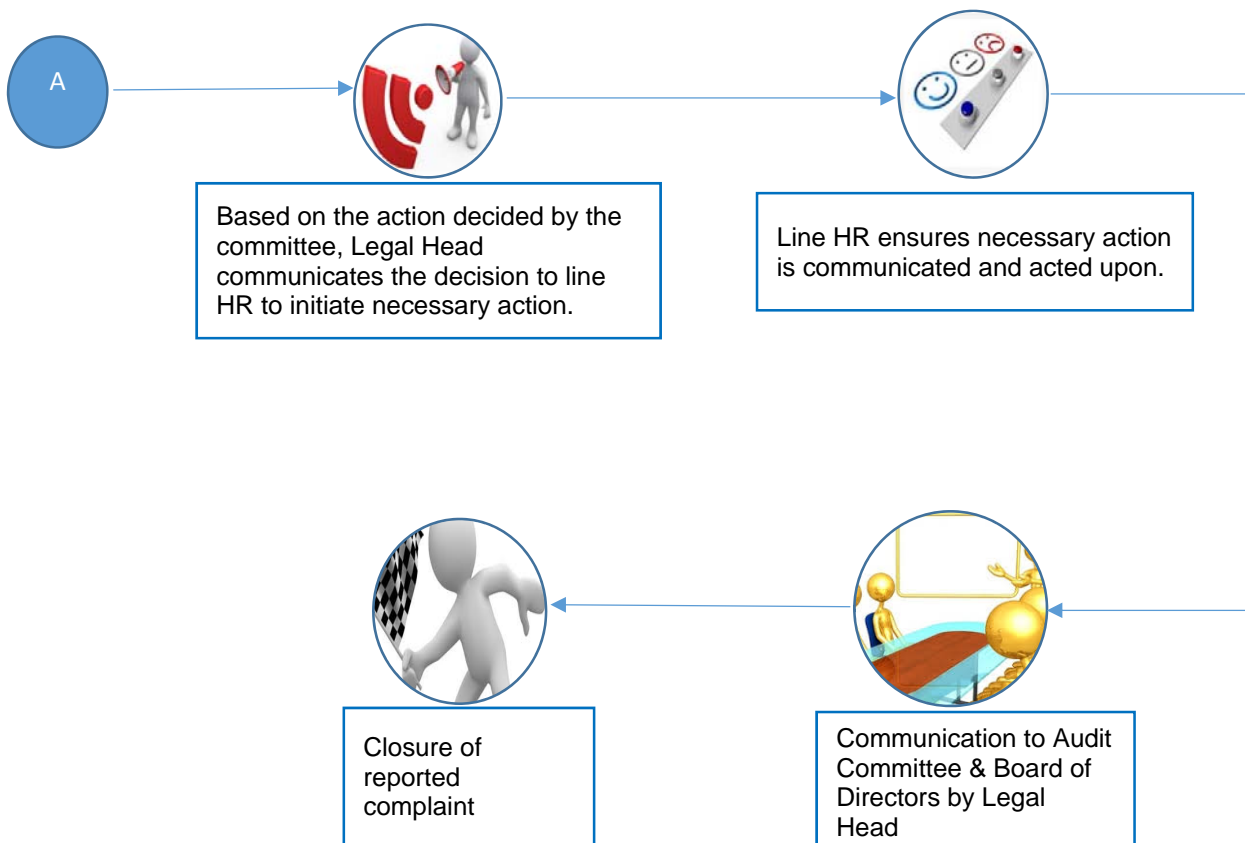
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Date: 12<sup>th</sup> February 2015