FINAL ASSESSMENT

INDIAN ORDNANCE FACTORIES

The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

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<th>Topic</th>
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<td>Leadership, Governance and Organisation</td>
<td>10</td>
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<td>Risk Management</td>
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<td>Company Policy and Codes</td>
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<td><strong>Total</strong></td>
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</table>
A1:
Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company.

References:

Public:
NA
A2:

Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

References:

Public:
NA
A3:
Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company’s Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company.

References:
Public:
NA
A4:
Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company publishes a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability. TI notes a brief statement on the company’s mission and vision. However, this does not reflect the standards of business conduct sought in the question.

References:
Public:
TI notes:
Company Website:
‘Mission
Production of State of the Art Battle Field Equipments
Vision
• To Equip our Armed Forces with Modern Defence and Battle Field Equipments
• To Continuously Modernise our Production Facilities
• To Train and Motivate Personnel
• To equip ourselves with Technologies through Acquisition, Synergy and In-house R&D
• To Continuously Improve Quality
• To improve operational efficiency and communications by extensive use of information technology
• To improve highest level of customer satisfaction
• To increase customer base in Defence, Non-Defence and Export markets and establish Global Presence’

A5:
Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption.

References:
Public:
NA
A6: Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda.

References:
Public: NA
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

2

Comments:
Based on public information, there is evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda. This person is the Chief Vigilance Officer, S. Rangarajan.

References:
Public:
Company website: Vigilance Officers
‘Shri S. Rangarajan,
Chief Vigilance Officer’.
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a process of a regular Board level monitoring and review of the performance of the company's ethics and anti-corruption agenda. TI notes that the Central Vigilance Commission's website states that the duties of the Chief Vigilance Officer include reviewing a company's ethics and anti-corruption agenda. However, no information about this review was found on the company website.

References:
Public:
TI notes:
CVC website:
'The CVOs undertake various measures, which include:
(a) To examine in detail the existing Rules and procedures of the Organisation with a view to eliminate or minimise the scope for corruption or malpractices;
(b) To identify the sensitive/corruption prone spots in the Organisation and keep an eye on personnel posted in such areas;
(c) To plan and enforce surprise inspections and regular inspections to detect the system failures and existence of corruption or malpractices;
(d) To maintain proper surveillance on officers of doubtful integrity; and
(e) To ensure prompt observance of Conduct Rules relating to integrity of the Officers, like
(i) The Annual Property Returns;
(ii) Gifts accepted by the officials
(iii) Benami transactions
(iv) Regarding relatives employed in private firms or doing private business etc.’
http://www.cvc.nic.in/rnfcvo.htm
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, or evidence of improvement plans being implemented when issues are identified.

References:

Public:
NA
A9:
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption.

References:
Public:
NA
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide.

References:
Public:
NA
A10:
Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:
Based on public information there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

References:

Public: NA
A11:
Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

References:
Public:
NA
A12:
Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption. TI notes the company’s consultancy agreement template, but has found no explicit evidence of monitoring processes or anti-corruption contractual rights.

References:
Public:
Consultancy Agreement:
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

2

Comments:
Based on public information, there is evidence that the company makes clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance. For major procurements the company makes its suppliers and contractors sign an integrity pact. Also, as a general rule it is made clear that on discovery of corrupt or fraudulent practices the contract will be terminated.

References:
Public:
Integrity Pact details on website:

Details of provisions in an integrity pact.

OFB Procurement Manual, 2010, p.79:
‘10.10.1 Termination of Contract: The Buyer, without prejudice to any other remedy for breach of contract, by written notice of default sent to the Supplier, may terminate the contract in whole or in part:
(d) If the Supplier, in the judgment of the Buyer, has engaged in corrupt or fraudulent practices in competing for or in executing the contract.’

(p.43):‘6.12.1 Termination of a Concluded Contract: A contract may be terminated in the following circumstances:
(b) When the contractor is found to have made any false or fraudulent declaration or statement to get the contract or he is found to be indulging in unethical or unfair trade
5.8 Grounds for Banning of Business Dealings

The grounds on which banning may be ordered are:

ii. If the proprietor of the firm, its employee, partner or representative is convicted by a court of law following prosecution for offences involving moral turpitude in relation to the business dealings.

iii. If there is strong justification for believing that the proprietor or employee or representative of the firm has been guilty of malpractice such as bribery, corruption, fraud, substitution of tenders, interpolation, mis-representation, evasion or habitual default in payment of any tax levied by law; etc.

v. If the firm employs a government servant, who has been dismissed or removed on account of corruption or employs a non-official convicted for an offence involving corruption or abetment of such an offence, in a position where he could corrupt government servants.

5.11 Clause on Penalty for use of undue influence: The seller undertakes that he has not given, offered or promised to give, directly or indirectly any gift, consideration, reward, commission, fees, brokerage or inducement to any person in servicing of the Buyer or otherwise in procuring the Contract or forbearing to do or for having done of forborne to do any act in relation to the obtaining or execution of the Contract or any other Contract with the Government for showing or forbearing to show favour or disfavour to any person in relation to the contract or any other contract with the Government. Any breach of the aforesaid undertaking by the seller or any one employed by him or acting on his behalf (whether with or without the knowledge of the seller) or the commission of any offence by the seller or anyone employed by him or acting on his behalf, as defined in Chapter IX of the Indian Penal Code, 1860 or the Prevention of Corruption Act, 1947 or any other Act enacted for the prevention of corruptions shall entitle the Buyer to cancel the contract and all or any other contracts with the seller and recover from the seller the amount of any loss arising from such cancellation.

Company website, Adoption of Integrity Pact:

‘In consonance with CVC Communication No. 007/VGL/033, Office Order No. 41/12/07, dated 04.12.2007 regarding Adoption of Integrity Pact in major Government procurement activities, Ordnance Factory Board has taken the following measures towards Adoption of Integrity Pact in Ordnance Factories Organization:

(i) A pre-contract Integrity Pact, as approved by MOD, has been circulated to all Ordnance Factories for implementation in procurement cases for contract value of Rs.100 Crore and above.’
A13(a):
Does the company explicitly address the corruption risks associated with offset contracting?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company explicitly addresses the corruption risks associated with offset contracting.

References:

Public:

TI notes:

Confederation of Indian Industry:

'India is the third largest importer of arms and equipment in the world. Every year nearly 30 to 40 % of the defence budget finds its way out of the country towards acquisitions either through direct or indirect imports. This is a major amount for any country leave alone India. The bottom line is that a substantial amount of precious National resources move out without giving corresponding benefit to the nation.

The commercial logic of Defence imports is most exploitative for any economy. When a country imports Defence equipment without offsets, it not only robs the country of dignity and makes it vulnerable to denial regimes, it also does not add to the economy of the country, either as capital / infrastructure or as consumption (money spent).

In order to leverage this buying power of the country, to achieve greater self reliance in defence production, Ministry of Defence, Government of India has announced the Offset Policy as part of the Defence Procurement Procedure (DPP) 2005.

The offset policy given in DPP 2005 mentions inclusion of an offset clause amounting to a minimum of 30 percent of the indicative costing in the RFP where the indicative cost of the contract is Rs 300 Crores or more.

CII has always strongly recommended that Direct Offsets be implemented as a matter of National Policy for Defence Procurement. The suggested aim of the Offset Policy should be
to get state-of-the-art technologies for both, Public and Private Sectors to give major thrust to Self Reliance and boost Defence exports. The Illustrative list of Priorities of the Offset Policy through Direct Offsets are:

- Acquisition and development of state–of-the-art technologies.
- Acquisition and development of manufacturing competence to create world class defence production industry
- Export of defence industrial products, sub-systems, engineering design and testing services

The Offset Policy introduced in DPP 2005 was further fine tuned in DPP 2006 as the offset clause would be applicable for all procurement proposals where indicative cost is above Rs 300 Crores and the schemes are categorized as ‘Buy (Global)’ involving outright purchase from foreign / Indian vendors and ‘Buy and Make with Transfer of Technology’ i.e Purchase from foreign vendor followed by Licensed Production.'

http://www.ciidefence.com/indiandefpolicy.asp

Excerpt from 'Offset Investment Inflow Priorities for Ordnance Factories'
by S.Gopalaswamy (Member Corporate Planning, Ordnance Factory Board), (2009):

'Already we are partnering with many foreign vendors for offsets services as follows:

- CQB Carbine and its ammunition.
- 155 mm Artillery Gun Program – towed, SP Wheeled, tracked, etc.
- Future Air Defence Gun.
- Naval Gun and Chaff launcher for fleet tanker.

Offset program will help the OFB in easier absorption of technology for indigenization upon contract finalization. The benefits will flow to the Indian Industry in general as OFB will like to be lead integrator with the help of the Indian public / private sector. This would provide technology to the local industry, enlarge the local content share in the defence sector and simultaneously provide economic benefits. Such a long term relationship would also act as an incentive for the foreign seller to deal with India in a mutually beneficial manner and this calls for using offset credit as an instrument. This would enable passing on the offset benefits across the three services irrespective of the product purchased. The most important factor to be ensured is that the technology gap should not be permitted to widen which can only happen if the offset equation is researched by both parties ensuring mutual advantages in the long run. With a good offset agreement, we can reap the maximum benefits.'

http://idsa.in/jds/3_1_2009_OffsetInvestmentInflowPrioritiesforOrdnanceFactories_SGopalaswamy.html
A13(b):

Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting its offset partners and offset brokers.

References:

Public:

Ti notes:

Confederation of Indian Industry website:

'India is the third largest importer of arms and equipment in the world. Every year nearly 30 to 40% of the defence budget finds its way out of the country towards acquisitions either through direct or indirect imports. This is a major amount for any country leave alone India. The bottom line is that a substantial amount of precious National resources move out without giving corresponding benefit to the nation.

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http://idsa.in/jds/3_1_2009_OffsetInvestmentInflowPrioritiesforOrdnanceFactories_SGopalaswamy.html
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has an anti-corruption policy that prohibits corruption in its various forms.

References:
Public:
NA
A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy is explicitly one of zero tolerance.

References:
Public:
NA
A17:
Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company's anti-corruption policy is easily accessible to Board members, employees, contracted staff and any other organisations.

References:
Public:
NA
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy is easily understandable and clear to Board members, employees and third parties.

References:

Public:
NA
A18:

Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company’s anti-corruption policy explicitly applies to all employees and members of the Board.

References:

Public:
NA
A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy on potential conflicts of interest, which applies to both employees and Board members.

References:
Public:
NA
A21:
Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
NA
A22:
Does the company’s anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy includes a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
NA
A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:
Public:
NA
A24:
Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company prohibits political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A25(a):
Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A26:

Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda.

References:

Public:
NA
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public: NA
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides anti-corruption training in all countries where the company operates or has company sites.

References:
Public:
NA
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:
Public:
NA
A30:
Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions

References:
Public:
NA
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

References:
Public:
NA
A32:
Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities.

References:
Public:
NA
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:
1

Comments:
Based on public information, there is some evidence that the company has channels that are easily accessible and secure, for employees to report concerns or instances of suspected corrupt activity. According to the Central Vigilance Commission’s website the Chief Vigilance officer is required to provide an independent channel for complaints. However, it is unclear whether the complaints that are made via the channel mentioned in the OFB whistle blower policy are to be received by the Chief Vigilance officer. Employees can also report concerns directly to the Central Vigilance Commission. However, it is not clear that any of the available channels guarantee anonymity when required. The company therefore scores 1.

References:
Public:
OFB whistle blower policy, p.3:
‘5.1.1 The contact details of the competent authorities are available on the website of the organisation www.ofbindia.gov.in and internally on the Comnet portal of the Ordinance Factory Board, Kolkata
5.1.2 The protected disclosure should be addressed to the competent authority as above
5.1.8 The Complaints can also be sent through e-mail’

(p.5): ‘6.3 Anonymous or pseudo anonymous complaints will not be entertained whatsoever’

CVC Website:
‘Central Vigilance Commission has been working towards leveraging IT for not only simplification of processes but also enhancing interaction with all the stakeholders in the
fight against corruption. An IT enabled Application for Complaints processing online has been developed and implemented in the Commission. This Application handles complains from all sources in electronic form and ensures expeditious disposal.

2. In this process, complaints on which it has been decided to send the same for ‘Necessary Action’ (NA) are being forwarded to the CVO concerned by the Commission through this Application. Such complaints sent for necessary action would henceforth not be sent in hard copy and will be transmitted electronically. However, the complaints sent for investigation and report to the CVO will continue to be handled/sent by post. In addition, the CVOs can also send the Monthly Reports electronically through this Portal.

3. Emails and SMS systems are also being integrated by this application for sending alerts to all the CVOs and for status updates to the complainants.’

http://cvc.nic.in/cir_29032012.pdf
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:
2

Comments:
Based on public information, there is evidence that across geographies, all employees have access to more than one whistleblowing channel. The whistleblower policy directs employees to the company's website and to the intranet portal for contact details of competent authorities to whom they can make a disclosure.

References:
Public:
OFB whistle blower policy, p.3:
‘5.1.1 The contact details of the competent authorities are available on the website of the organisation www.ofbindia.gov.in and internally on the Comnet portal of the Ordnance Factory Board, Kolkata

5.1.2 The protected disclosure should be addressed to the competent authority as above

5.1.8 The Complaints can also be sent through e-mail’

‘The purpose of this policy is to provide a framework......and responsible and secure whistleblowing. It protects the employees wishing to make genuine and bonafide complaint about serious irregularities in the Ordnance Factories Organisation
Further the policy goes on to describe employees as all those on roll and the policy’s applicability to all functions and departments of the Indian Ordinance Factory’

A33(b):
Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively. TI notes that the company takes measures to minimize difficulties for whistleblowers, including help in any judicial processes associated with the same. However, it is unclear if this includes mechanisms such as independent employee surveys or the monitoring of whistleblowing channel usage statistics.

References:
Public:
TI notes:
OFB whistle blower policy, p.5:
‘Protection
7.1 The identity of the whistle blower shall be kept confidential to the extent possible and as permitted under the law.
7.2 The Ordinance Factories Organisation, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against whistleblowers.........The competent authority must also ensure that complete protection is given to the whistleblower against any unfair practice like retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, denial of promotion or the like including any direct or indirect use of authority to obstruct the whistleblower’s right to perform his duties/functions...
7.3 The Ordinance factory will take steps to minimize difficulties , reported by the whistle blower for making the protected disclosure
7.4 The whistle blower may report any violation of the above clause to the competent authority who shall investigate into the same and recommend suitable action.
7.5 If the Whistle blower is required to give evidence in criminal or judicial procedures, he will be given all the necessary assistance.

7.6 Any other employee assisting in the said investigation shall also be protected to the same extent as the whistle blower.’

A34:

Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:

1

Comments:

Based on public information, there is some evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues. In particular, the contact details of vigilance officers are available on the company website. However, it is unclear if they provide guidance on anti-corruption issues or only handle complaints. The company therefore scores 1.

References:

Public:
Company website, Vigilance Officers:
Chief Vigilance Officer
Director/Vigilance (Headquarter)
Director/Vigilance (East)
Director/Vigilance (Headquarter)
Director/Vigilance (West)
Director/Vigilance (South)
Director/Vigilance (North)
Director/Vigilance (Central)
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Director/Vigilance (West)

Director/Vigilance (West)
Name and Designation of the Officer Contact Information  
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Whistleblower Policy, p.2:
‘Whistle Officer: officer nominated by the competent authorities to conduct investigation of complaint received under this policy’
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

1

Comments:
Based on public information, there is evidence that the company has a commitment to non-retaliation for bona fide reporting of corruption. However, there is no readily available evidence that disciplinary measures are applied to employees who breach this policy. The company therefore scores 1.

References:
Public:
OFB whistle blower policy, p.5:
‘Protection
7.1 The identity of the whistle blower shall be kept confidential to the extent possible and as permitted under the law.
7.2 The Ordinance Factories Organisation, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against whistleblowers..........The competent authority must also ensure that complete protection is given to the whistleblower against any unfair practice like retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, denial of promotion or the like including any direct or indirect use of authority to obstruct the whistleblower’s right to perform his duties/functions...
7.3 The Ordinance factory will take steps to minimize difficulties, reported by the whistle blower for making the protected disclosure
7.4 The whistle blower may report any violation of the above clause to the competent authority who shall investigate into the same and recommend suitable action.
7.5 If the Whistle blower is required to give evidence in criminal or judicial procedures, he will be given all the necessary assistance.
7.6 Any other employee assisting in the said investigation shall also be protected to the same extent as the whistle blower.’
Information Sources:

Company website:
http://ofbindia.gov.in

OFB Procurement Manual (2010):

Manual for procurement of plant & machinery in ordnance factories (2013):

Company website, Vigilance: