



## **WHISTLEBLOWER POLICY**

### **Introduction**

Vishwa Samudra Group/Holdings (the “Company” or “VSH”) is a multilateral business conglomerate and is committed to the highest standards of professionalism, integrity, honesty & ethical behaviour for its business operations. To maintain these standards, the company has formulated several policies to assist all in achieving and maintaining these standards.

**“Whistleblower policy” applies to all companies under the flagship of VSH**, their Directors, Employees and other Stakeholders such as Borrowers, Key partners, Vendors etc. working for the group and its subsidiaries.

The purpose of the Whistleblower Policy (“the Policy”) is to provide an avenue for Directors, Employees and other stakeholders to report matters without the risk of victimization or discrimination. This Policy provides adequate safeguards against victimization of “Whistleblowers”, in case they observe and report any “Unethical and improper practices” or any other “Wrongful conduct” in the Company.

However, the policy does not protect any whistleblower from an adverse action which occurs independent of his disclosure of unethical and improper practice or alleged wrongful conduct, poor on the job performance, any other disciplinary action; unrelated to a disclosure made pursuant to this policy.

**“Whistle Blower”** shall mean Director(s), Employee(s), other Stakeholder (s) of the company who discloses in good faith, any unethical and improper practices or alleged wrongful conduct/act.

## Purpose & Scope of the Policy

To encourage the Employees / Directors / Stakeholders to report any **Unethical and Improper practices / behaviour**, malpractices, **alleged wrongful conduct**, fraud, violation of the company's policies and values, violation of law by any employee of the VS group, without any fear being questioned or retaliation or victimization.

The policy intends to cover the following information on suspected unethical and improper practices or wrongful conduct, which the complainant (Whistle Blower) in good faith believes to exist:

- a. Divulging Confidential information of the Company
- b. Abuse of power or authority for any unauthorised or ulterior purpose
- c. A substantial & specific danger to public health & safety
- d. Breach of Contract or company Code of Conduct
- e. Bribery issues
- f. Misrepresentation / Manipulation of facts/company data or falsification of records / reports of the company
- g. Misuse / Wastage of Company assets / funds (Bills forgery, using company assets for personal use etc.)
- h. Dual employment scenarios and submission of false information at the time of joining the company
- i. Misusing functional procedural lapse including misrepresentation of facts
- j. Indulgence in any unlawful Act, involving violation of any criminal / civil law, causing physical harm / damage to person / property
- k. Unfair discrimination, coercion, harassment in the course of employment or provision of services
- l. Any other activity not listed above but is prejudicial to the interest of the company

Caution to be exercised, not to indulge in baseless allegation and it should not be used in place of the Company's grievance procedure or be a route for raising malicious or unfounded allegations against colleagues.

Any Director / Employee / stakeholder, knowingly hiding information in any form regarding any unethical practices / activities in one's workplace will also constitute unethical practice on the employee's part.

## Vigil Mechanism

All "Protected Disclosures/ Concerns" can be marked on [whistleblower@vishwasamudra.in](mailto:whistleblower@vishwasamudra.in).

The administrative access to manage the inbox will be with "Enterprise Risk & Fraud Control" team.

"Whistleblower Committee" will have senior most members of the group as members.

As and when any complaint/grievance is received, copy of the complaint will be shared with Committee members within 24 hours and within a reasonable time frame, the acknowledgement shall be sent to the sender of the complaint. The acknowledgement shall confirm receipt of the concern and to inform the sender that the concern would be inquired into and appropriately addressed. In case the concern does not fall within the ambit of WB policy, the sender shall be informed that the concern will be addressed by appropriate department / authority/committee, as may deemed fit. Members of Committee upon receipt of the concern or complaint shall immediately initiate inquiry into the matter. Members shall report the details of the matter received to the Risk Management Committee during the quarterly meeting. Members shall also update on the inquiry status and action taken on the case / employee, basis the Code of Conduct and Malpractice Matrix.

**Anonymous Complaint** – The policy encourages the whistle blower to put their names in the concern / grievance so that follow up queries can be appropriately addressed, which will become impossible if the disclosure is anonymous. Concerns expressed anonymously will generally not be entertained and will be on the discretion of the organisation (depending upon the credible information available).

## **Confidentiality**

The Company will treat all such disclosures in a sensitive manner and will keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.