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# Document Control

This Policy was first approved by the Board of Directors at its meeting held on June 16, 2023

## Version History

VERSION NO	DATE OF CREATION / MODIFICATION	EFFECTIVE FROM
1	June 16, 2023	June 16, 2023

The Policy is available on the intranet and on the website of the Company.



# 1 Preamble

- The Company encourages an open and transparent system of working and dealings between the employees, policyholders and members of general public coming into contact with the Company.
- The Company has adopted a Whistle Blower Policy, which outlines the Company's commitment to ensure that all directors, employees, and parties in a direct contractual/ fiduciary relationship with the Company or any other person, are able to raise concerns regarding any serious irregularities or any unfair practice or any event of misconduct or any illegal activity occurring in the Company.

# 2 Definitions

- **Whistle Blower**

A Whistle Blower means any person who raises a concern in accordance with this Policy including but not limited to Directors, Employees, Agents, Third Party Service Providers and Intermediaries.

- **Whistle-blowing 'Concern' or 'Complaint' (also referred to as 'complaint' or 'concern')**

It can be described as attracting management's attention to information about potentially illegal and/or unacceptable practices.

Any person can raise concerns/issues, if any, which they have on the following or possibilities / apprehensions of:

1. Breach of any law, statute or regulation by the Company;
2. Issues related to accounting policies and procedures adopted for any area or item
3. Acts resulting in financial loss or loss of reputation
4. Misuse of office, suspected / actual fraud and criminal offences
5. Leak of Unpublished Price Sensitive Information (UPSI)
6. Manipulation of company data or records
7. wastage or misappropriation of company funds or assets
8. Breach of confidentiality, proprietary information, IT security or data privacy
9. Bribery or corruption
10. Social media misuses
11. Retaliation against a person reporting, informing or participating in the investigation
12. Breach of contracts or company policies or failure to implement company policies
13. Matter which are sub-judice shall be excluded



- Employee

Every employee of the Company, including a director of the Company, Head of each function, employees on probation, and includes an ex-employee of the Company.

- Investigators

Those persons authorized, appointed, consulted or approached by the Whistle Blower Committee and may include the auditors of the Company.

- Complainee/ Respondent/ Accused

A person against whom or in relation to whom a complaint/unethical activity has been reported or evidence gathered during the course of an investigation.

- Policy

This Whistle Blower Policy.

## 3 Scope

The Policy covers all employees including those who are on deputation, contractors, contractors' employees, trainees, vendors, consultants, agents or other third parties engaged by the Company.

## 4 Whistle Blower Committee

The Whistle Blower Committee shall be constituted with the following members and the Committee shall meet as and when a complaint is made or an unethical activity is reported:

- a. Group General Counsel
- b. Chief Human Resource Officer
- c. Associate Director Corporate Affairs

Officers of the Company or its affiliates can be invited on need basis.

The quorum of the Committee shall be minimum two members present and any vacancy in the Committee shall be filled by the Board as soon as practicable possible. If the Board requires, it may designate any person to serve on the Committee in the interim till the time the vacancy is filled.

## 5 Disqualifications

- Any abuse of the protection under this Policy will warrant disciplinary/ penal action, as decided by the Whistle Blower Committee, in consultation with the Audit Committee or Board as the case may be and after being referred to the appropriate authority with recommendations for necessary action as deemed fit.
- Whistle Blower who makes false or baseless allegations, with a mala fide intention or knowing it to be false or baseless, would be subject to disciplinary/ penal action, as appropriate, under the relevant rules/ laws and will not be protected under this Policy.

## 6 Procedure for making Complaint

- An unethical activity can be reported to the Whistle Blower Committee as per format given under Annexure -A, through any of the channels mentioned below:
  - a. Email at [whistleblower@acko.tech](mailto:whistleblower@acko.tech)
  - b. Write to the Whistle Blower Committee at Acko Technology & Services Private Limited, #36/5, Hustlehub One East, Somasandrapalya, 27th Main Rd, Sector 2, HSR Layout, Bengaluru, Karnataka 560102
- It is clarified that no complaint should be disregarded for not following the format (including being an anonymous complaint) till such time minimum information required to examine the issue is available in the complaint.
- If the complaint is against any member of the Whistle Blower Committee, the complaint can be submitted to the Chairman of the Audit Committee or the any of the Board at the following address: The Chairman - Audit Committee, Acko Technology & Services Private Limited, #36/5, Hustlehub One East, Somasandrapalya, 27th Main Rd, Sector 2, HSR Layout, Bengaluru, Karnataka 560102
- Complaint should be factual, specific and verifiable.
- Complaint should be to a large extent “full and proper” so as to cause a meaningful understanding of the subject matter of disclosure.
- The Committee will periodically review the quantum of cases being reported and if at any time the Board or the Committee is of the view that a 3<sup>rd</sup> party platform should be used, the necessary action to engage the same will be undertaken.

## 7 Protection

- The identity of the Whistle Blower and that of the complainee / accused will be kept confidential.
- No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported an unethical activity under this Policy.
- The Company shall not resort to any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers.
- Complete protection will, therefore, be given to the Whistle Blowers against any unfair practice like retaliation, threat of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his normal/ allotted duties/functions including making further Protected Disclosure.
- Any other person assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.
- Normally, the identity of the Whistle Blower is protected under the policy. In the event of perceived harassment of the Whistle Blower by the affected employee/ third party, he may file an application before the Chief Human Resource Officer seeking redressal in the matter. The Company would then intervene suitably to protect the Whistle Blower.

No adverse penal action shall be taken or recommended against whistleblower in retaliation to his disclosure in good faith of any unethical and improper practices or alleged wrongful conduct even though no misconduct may have been determined after the investigation.

- Whistle Blowers, who make any disclosures, which have been subsequently found to be malafide or frivolous or malicious shall be liable to be prosecuted and appropriate disciplinary action will be taken against them under Service Rules/ bipartite settlements only when it is established that the Complaint has been made with intention of malice.
- This policy does not protect an employee from an adverse action which occurs independent of his disclosure under this policy or for alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy.

## 8 Investigation

- All complaints/disclosures where a prima facie case has been established by the Whistle Blower Committee will be thoroughly investigated to bring the matter to its logical conclusion. The Committee at its discretion may appoint such independent third parties / consultants / forensics experts to carry out investigation.
- The Committee has a power to take all necessary and reasonable steps in the interim including but not limited to asking accused to go on a paid leave till the time investigation is concluded.
- The decision to find the facts or to conduct an investigation is by itself not an accusation and is to be treated as a neutral process to verify the case. The outcome of the investigation may or may not support the conclusion of the Whistle Blower that an improper act was committed.
- The identity of the Whistle Blower and the complainee / accused will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- Once a prima facie case is established, complainee / accused will normally be informed of the allegations before the commencement of the process of further investigation and shall be given adequate opportunity to defend themselves during the investigation. Reporting Managers, peers, subordinates of the complainee / accused, stakeholders and third parties may also be contacted on merits to establish the veracity of a complaint on a need to know basis and be subject to confidentiality obligations. Further the information disclosed during the investigation shall remain confidential.
- Complainee / accused shall have a duty to co-operate with the Whistle Blower Committee or Investigators during investigation.
- Complainee/ accused shall be given a reasonable opportunity of being heard and shall have a right to consult, at his own cost, any person or persons of their choice, other than the Investigators.
- Complainee / accused shall not 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 complainee / accused.
- Unless there are compelling reasons not to do so, complainee / accused will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrong doing against a complainee / accused shall be established unless there is sustainable evidence in support of the allegation.
- Complainee / accused shall have the right to be informed of the outcome of the investigation.





- The Whistle Blower Committee/Investigators shall complete the investigation within 60 (sixty) days or within such time as is necessary, from the receipt of the complaint and submit the report to the Whistle Blower Committee.
- On the completion of investigation, it would be the responsibility of the Whistle Blower Committee to recommend a suitable action and also advise the concerned Department Head to take suitable corrective measures to avoid recurrence of such complaint and take appropriate action against the alleged person.
- Decision on the report would be taken by the Whistle Blower Committee within 30 days from the date of the report.

## 9 Reporting

- In case of complaints received, the Whistle Blower Committee shall submit a Half yearly report to the Audit Committee and Board, about such complaints referred to them since the last report together with the results of investigations, if any (whether a prima facie case was determined by the Committee or not).
- In case of complaints received against any of the Key employee/ KMP prompt information be submitted to the Audit Committee/Board.

## 10 Notification

- Any changes to the Policy will be notified on the website of the Company.
- All the concerned will be notified by hosting the extract of the Policy on the website of the Company.

## 11 Review

- The Policy shall be reviewed annually and will be placed before the Audit Committee of the Board and the Board of Directors for its approval.

## 12 Record Keeping

Records pertaining to the complaint shall be maintained by the team responsible for it. Records shall be maintained as per the extant policy of the Company, currently defined as 10 years.



WHISTLE BLOWER COMPLAINT FORM:

To  
The Whistle Blower Committee  
Acko Technology & Services Private Limited,  
#36/5, Hustlehub One East, Somasandrapalya,  
27th Main Rd, Sector 2, HSR Layout,  
Bengaluru, Karnataka 560102

**PERSONAL INFORMATION OF WHISTLE BLOWER**

1. Name:
2. Address.
3. Employee ID, if any"
4. Cell No.
5. email address
6. Person(s) against whom the complaint is made:
7. Details of Complaint (use extra sheet if required):

8. DECLARATION

I declare that the above information is furnished by me under Whistle Blower Policy of the Company which is true and correct to the best of my knowledge, information and belief.

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Signature

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Date

Notes:

1. Web link of the form is attached herewith [to be inserted here]