



WHIZDM FINANCE PRIVATE LIMITED
Whistle Blower Policy
Version 2.0/ 2024-25

Approved by	Board of Directors
Date of original approval	26.03.2024
Date of Amendment	11.12.2024
Version	Version 2.0/2024-25

PURPOSE

Whizdm Finance Private Limited “WFPL/Company) is committed to complying with the laws that apply to them, satisfying the Company’s Policies and particularly to assuring that business is conducted with integrity. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties. This can have adverse consequences financially as well as from a compliance perspective. Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation.

DUTY TO REPORT

Everyone is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company’s policies, values and ethics. It is important that you report all suspected violations.

You must, when you reasonably suspect that a violation of any applicable law or the Company's Policies, values and ethics has occurred or is occurring, report that violation. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws. You should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.

The Policy covers malpractices and events which have taken place/suspected to take place involving:

1. Negligence causing substantial and specific danger to public health and safety
2. Negligence causing substantial financial or reputational cost
3. Manipulation of company data/records
4. Financial irregularities, including fraud or suspected fraud
5. Any unlawful act whether Criminal/ Civil
6. Deliberate violation of law/regulation
7. Wastage / misappropriation of company funds/assets
8. Bribery or corruption
9. Misconduct
10. Breach of IT Security and data privacy

The following nature of complaints shall not be covered by this Policy:

- 1) Complaints that are frivolous in nature;
- 2) Issues relating to personal grievance (increment, promotion, etc.); and
- 3) Sexual harassment as it is covered by Anti Sexual Harassment Policy. If the Compliance Officer, Ethics Committee or Audit Committee receives a sexual harassment complaint, it should be forwarded to Sexual Harassment Committee set up for this purpose on the basis of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

If such complaints are received, they shall be forwarded to respective stakeholders for action on the same.

If a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the Company shall take appropriate disciplinary against the concerned individual who has made the complaint.

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

HOW TO REPORT

Report your concerns to your manager, human resources manager or you can write at following :
E-mail: whistleblower@whizdmfinance.com

Your report should include as much information about the suspected violation as you can provide. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. However, your identity shall not be disclosed to any person against whom such complaint has been made or who are believed to be involved in the suspected violation.

INVESTIGATIONS AFTER YOU REPORT

All reports under this Policy will be promptly and appropriately investigated, and 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. Everyone working for or with the Company has a duty to cooperate in the investigation of reports of violations. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

Grievance redressal committee for employees at group level shall be the authority for taking final decision on investigation outcome. Preliminary enquiry and investigation shall be done by HR.

RETALIATION IS NOT TOLERATED

No one may take any adverse action against any employee for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation of any law, this Policy, or the Company's Policies, Values and Ethics.

ADOPTION AND MODIFICATION

The Board of Directors of the Company can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with regulations and / or accommodate organizational changes within the Company.

MANDATORY DISPLAY OF THE POLICY

A copy of the Policy shall be placed at Company's website i.e. www.whizdmfinance.com