

## **WHISTLE-BLOWER POLICY**

### **1. PURPOSE:**

Chemmanur Credits and Investments Limited (CCIL, "The Company") is committed to conducting business with integrity and in accordance with all applicable laws and regulations. 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 and also loss on account of wrong practices.

This policy is applicable to any person who shares any such unethical practice in the organization including violation of law, if any, to the management.

### **2. OBJECTIVE:**

To promote organizational interest and organizational accountability as an NBFC following correct practices.

Whistle blowing would be more respected in CCIL as a measure to prevent illegal / unfair activities and promote professional procedures.

### **3. DEFINITIONS:**

The definitions of some of the key terms used in this policy are given below:

- (a) "**Whistle-Blower**" means anyone including an employee of the Company making a disclosure under this policy.
- (b) "**Disclosure**" means any communication in relation to an unethical practice (including anonymous disclosures, by any means) made in good faith by the Whistle-Blower to the designated authority under this policy.
- (c) "**Unethical practice**" means and includes, but not limited to, the following suspected activities/ improper practices if any followed in the Company:
  - (i) Manipulation of Company data / records.
  - (ii) Abuse of authority at any defined level in the Company.
  - (iii) Disclosure of confidential / proprietary information to unauthorized persons.
  - (iv) Any violation of applicable laws and regulations to the Company, thereby exposing the Company to penalties/ fines.
  - (v) Any instances of misappropriation of Company assets.
  - (vi) Activity violating any laid down Company policy, including the Code of Conduct.

- (vii) Indulging in corrupt practices, misappropriation, fraudulent conversion and the like, breaching/ subverting the rules, procedures for personal gain, committed singly or in concert
- (viii) Gender related misconduct, harassment of any kind including physical, mental abuses of employees and customers.
- (ix) Malicious acts, slander, libel and such acts as may cause injury to the reputation or business interests of the company and its employees.
- (x) Any other activities whether unethical or improper in nature and injurious to the interests of the Company.

#### **4. POLICY:**

The policy is to facilitate reporting of an illegal or foul play in professional, day to day operational activities of CCIL to the top management. Internal whistle blowing is implemented as a part of Corporate Governance. A whistle-blower can report unethical practice by an employee or superior within the company/likely to affect the Company and can be informed through a designated E-mail. It is probable that many people do not even consider blowing the whistle, not only because of fear of retaliation, but also because of fear of losing their relationships at work and outside the work. People who are reluctant to report wrong happenings within the organization are more likely to report the same if a confidential option is made available. The information provided by the whistle-blower shall be kept confidential to encourage reporting.

#### **5. REPORTING MECHANISM:**

Information can be emailed by any whistle-blower to [whistleblower@chemmanurcredits.com](mailto:whistleblower@chemmanurcredits.com) about unethical practice followed in the Company. The unethical practice may include violation of a law, rule, regulation and/or a direct threat to organizational interest, such as corruption, fraud, health/safety violations and matters other than personal.

The email shall include as much information about the suspected violation as the whistle-blower can provide. Where possible, it shall 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. The e-mail shall be sent from any e-mail. It is not necessary to reveal the identity of the whistle-blower. If the Whistle-blower is willing to disclose the identity, he/she may be contacted for further information if required.

All the matters related to whistle-blower reports will be viewed and handled with utmost confidentiality by a designated senior official of the company to the satisfaction of the Management.

## **6. ROLE OF WHISTLE-BLOWER**

The role of a Whistle-blower is limited to providing information related to unethical practices only.

## **7. DOCUMENT RETENTION:**

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

## **8. PROCEDURE FOR HANDLING THE REPORTED INFORMATION:**

The designated authority handling the whistle-blower mails shall convey the information received to the concerned reporting authority of employee engaged in the unethical practice not below the rank of Head of the Department (HOD). The official concerned shall initiate necessary investigation maintaining confidentiality of the information and take appropriate action for closure of the case and report the outcome to the designated senior official handling whistle-blower mails. The designated senior official shall submit a consolidated report to the Audit Committee mentioning the summary of the information received and the current status of dealing with it.

## **9. PROTECTION OF WHISTLE-BLOWERS:**

- If a Whistle-blower does provide his or her name when reporting an unethical practice, CCIL will treat as confidential the identity of the Whistle-blower and the fact that a reporting has been made, except as otherwise required by law and to the extent possible while allowing an investigation to proceed.
- A Whistle-blower may report an unethical practice without fear of retaliation or intimidation. CCIL prohibits its Employees from engaging in retaliation or intimidation that is directed against a Whistle-blower. Employees who engage in retaliation or intimidation in violation of this Policy shall be subject to disciplinary action.

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