

WHISTLE BLOWER POLICY

1.0 INTRODUCTION

Kamal Fincap Pvt Ltd believes that good communication between staff at all levels throughout the organization promotes better work practice. We seek to conduct ourselves honestly and with integrity at all times. However, we have acknowledged that our organization faces the risk of activities going wrong from time to time, or of unknowingly harboring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. On this basis, staff and customers alike are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals; we protect them from victimization and dismissal.

2.0 AUTHORITY FOR WHISTLE BLOWER POLICY

Overall authority for this policy sits with the Head of Human Resources. However, all the Managers have a specific responsibility to facilitate the operation of this policy and to ensure that staff and volunteers feel able to raise concerns, without fear of reprisals, in accordance with the procedure set down below. Each member of the staff is responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.

1.0 PROCEDURE FOR RAISING A CONCERN

If you believe that the actions of any employee working in the organization constitutes any malpractice or wrongdoing then you should take the following steps:-

- (i) Examine and verify your concern to the best of your ability to ensure you do not make a frivolous complaint.
- (ii) Once satisfied about the genuineness of your concern, immediately raise the matter to your reporting manager.
- (iii) If you suspect the reporting manager is involved in the alleged malpractice or he is not responsive to your complaint, then bring the matter directly to the attention of the Head (Human Resources).
- (iv) Mrs. Richa Trivedi, Head- HR (Human Resources), sits at the organization's head office at Kota and can be reached at hr@kamalfincap.com.
- (v) You may raise your concerns either verbally or in writing and should include full details and, if possible, supporting evidence.

2.0 CONFIDENTIALITY

All employees are hereby assured that while dealing with any complaint, every effort would be made to keep the identity of the complainant strictly confidential and care would be taken to ensure that the complainant is not victimized in any manner.

If it is necessary for the complainant to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential during the course of the investigation.

In rare cases, where it may be necessary to disclose the identity of the complainant to proceed with the investigation and/or legal action, then the consent of the complainant would be sought before proceeding further.

5.0 SUPPORTS FOR WHISTLE BLOWERS

If you believe that you are being subjected to harm within the workplace as a result of raising concerns under this procedure, then inform Head (Human Resources) immediately. Employees who victimize or retaliate against those who have raised concerns under this policy will be subjected to immediate disciplinary action.

6.0 HOW A DISCLOSURE WILL BE HANDLED

- 6.1 The Head of (Human Resources) will get in touch with you to acknowledge your complaint and confirm that the same is being investigated.
- 6.2 The Head Human Resources will call a committee to oversee the complaint and investigation thereof. The committee should consist of at least three members as follows:
 - (a) The Head Human Resources
 - (b) Any two of the following – the Manager (Internal Audit), the senior operations managers (of the rank of D.R.M. or above), any board member
 - (c) Care should be taken to ensure that no member of the committee is junior to the employee against whom the malpractice has been alleged.
- 6.3 The Committee so constituted shall take steps to independently verify the complaint.
- 6.4 On being satisfied about the veracity of the complaint and depending upon the severity of the malpractice, the Committee will take a vote to either initiate disciplinary action against the employee(s) concerned or to launch a formal investigation with a view to take harsh measures (including possible criminal action or police complaint) against the said employee(s).
- 6.5 The Committee will inform the complainant if a referral to an external authority is proposed to be made.
- 6.6 The Committee will also propose and implement changes to ensure that similar malpractices are not repeated in the future.
- 6.7 Upon conclusion of the investigation / disciplinary action, the Manager (Human Resource) will inform the complainant of the same and will share the details of the action taken, to the extent possible.

7.0 FALSE DISCLOSURES

We will treat all disclosures of malpractice seriously and protect staff who raise concerns in good faith. However, the Whistleblower Policy must not become a tool to settle personal grudges or vendettas. Accordingly, appropriate disciplinary action will be taken against any employee who is found to have made a disclosure maliciously or in bad faith or without reasonable grounds for believing that the information supplied was accurate.