

# Whistle-Blower Policy

## Document Version History

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1.0	Original Document	16.05.2023	Shrabanti Patel	16.05.2023 Ananya Board Members

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## **Preface:**

Ananya Finance for Inclusive Growth Private – AFIG, the company as it may be referred to in the policy document

## **Section 1: Our purpose**

### **Our Goals & Commitment**

To achieve our vision, mission, and long-term goal, it is crucial that AFIG employees and all the other parties like consultant, trainees, Business Partner’s understand, follow, and adhere to our Values and code of conduct.

Together with our Values, AFIG wants to have feedback and encourage people to speak up when they see activity or behaviour that they feel is wrong or does not match our Code of Conduct. This policy aims to provide clear guidelines on how we approach and manage this feedback and ensure that:

- Every AFIG employee has the chance to speak up anonymously when they feel that the organization is not adhering to our Values and Code of Conduct. They should have a place to report misconduct. Every report will be heard and acted on, and we will make improvements based on the results;
- Everyone is able to make reports anonymously. The company commits to protect informant's identities, and will only need reveal if complainant choose to; and
- Investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

### **Our Commitment**

Ananya Finance for Inclusive Growth Private Limited (AFIG) wants its employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report. AFIG also wants to let them know about their right to be anonymous as well as how AFIG, as an organization, will ensure they are not subject to any retaliation or other abuse because they made a report.

### **What conduct should be reported**

We would want to hear from you if you witness or know about any behaviour that is listed in the Code of Conduct, such as harassment, discrimination, conflict of interest, etc. but not limited to.

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## Who falls under this policy

The following would be considered an “eligible person” and would fall under AFIG’s whistleblowing policy.

- AFIG’s director, management, and employees; and
- Contractors, consultants, business partners, trainees, interns etc

This policy applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

## Section 2: Process for Making a Report

### What options do employees have for making a report?

If an employee or eligible person would like to make a report, they have different channels available where they can do this.

- Anonymous email;
- Via post;
- Speak with a senior leader of the Company
- Speak with the Whistleblowing program owner

### You can remain anonymous

The Company respects and protects the identity if the employee choose to make an anonymous report. One can choose to remain anonymous while making a report, interacting with an investigator(s) during an investigation of your report, as well as after your case is closed. At any given time, you can identify yourself, but this is your choice, and at no point you need to do this or be forced to provide your identity.

If you decide to disclose your identity, the company will protect your identity and outline and document who in the organization should be aware of the actionable. The company will also take all steps necessary (and outlined in this policy) to ensure that nobody suffer any retaliation.

AFIG will make every endeavour possible to investigate the complaint reported, but in some cases, there can be limitations of what can be achieved if the informant decides to remain anonymous.

## What is the investigation process?

As the company wishes to be transparent with all our associates below is the process outlined how the investigation will be submitted through the whistleblowing channels. Below, are the different steps of whistleblowing team will go through once a report is received until the case is closed.

#	Event	Person(s) in Charge
1	Report (anonymous or otherwise) is received.	Senior management or Whistleblowing program owner
2	Whistleblowing program owner assigns the investigator(s) to the report to assess it and confirm its receipt.	Whistleblowing program owner / Investigator
3	The investigator will do an initial assessment to confirm it is a valid report and request the informant to investigate.	Investigator
4	The investigator will begin their investigation. This can include corresponding with the informant if there is a channel to do this.	Investigator
5	The investigator will investigate and update the Whistleblowing program owner and the informant per policy guidelines.	Investigator
6	At this point, the investigator(s) will hand everything over to the Whistleblowing program owner for any subsequent action to take place.	Investigator & Whistleblowing program owner

## How we use 3rd parties

The company can also utilize 3rd parties in the whistleblowing program if needed. Examples of how we might utilize 3rd parties include:

- **Accounting Firms:** Any 3rd party accounting firms can be appointed by the company to do forensic investigation of specific reports that come through as a whistleblowing program.
- **Investigative & Law Firms:** Specialist investigative firms to investigate specific cases where we do not have the in-house skills. They are also used for investigations that we would prefer a 3rd party execute due to the report's nature.
- **Human Resources Consultants:** The company can utilize human resources consultants across business and they might be involved in specific whistleblowing cases, ensuring we use human resource best practices as we assess, investigate, and take action.

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### Who is alerted to a report

Once a report is submitted (anonymous or not), this report goes to the Whistleblowing program owners. They will then assess the report and assign it to the investigator(s), who will manage the investigation.

Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared unless the company is compelled by the law of the land.

### What is the process of updating the informant?

As part of our investigative process, AFIG will update the informant on the progress of the investigation. These updates can include the following:

- Confirmation of the receipt of a report from the informant.
- The company has begun the investigative process and its ongoing status
- Closure of the investigation

The company's commitment is that the informant will be updated at least once a month while the investigation is ongoing and then once the investigation has been closed.

AFIG will strive to provide as much feedback on the investigation as possible. However, there is often information that cannot be shared with the informant.

### What if the informant is not satisfied with the result

If, after receiving the summarised report of the investigation, the informant is not satisfied with the result, they can escalate this to the Audit Committee chair Pradeep Arora([pradeep.arora@ananyafinance.com](mailto:pradeep.arora@ananyafinance.com)). The informant can provide this escalation in writing so that a formal review can take place. While the Audit Committee commits to review the request, the company is under no obligation to reopen the investigation. If the Audit Committee concludes that the investigation was conducted properly and no new information exists that would change the results of the investigation, the investigation will be concluded.

## Section 3: How informants are protected

### Protection of informants

Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee:

- Discloses the information in good faith
- Believes it to be substantially true

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- Does not act maliciously nor makes false allegations
- Does not seek any personal or financial gain from the company

AFIG will not tolerate any attempt on the part of anyone to retaliate, apply any sanction or disadvantage or to discriminate against any person under this policy.

It is the responsibility of the company to provide complete protection to any person who has reported any serious and genuine concern regarding an apparent wrongdoing to the best of the knowledge.

In case any false allegation or misleading information's are being given by the complainant or the related parties during the course of investigation or after the investigation disciplinary actions will be taken as mentioned in the HR Policy of AFIG Policy manual

### **Anonymity after submitting a report**

How an eligible person can remain anonymous during the process of submitting the report. After submitting the report, the following policies around anonymity are in place to protect an informant's identity.

- The informant has the right to remain anonymous and does not need to identify themselves at any time during the investigation process.
- The company uses tools and platforms that help protect an informant's identity during and after submitting a report.
- At no time will the company force the informant to reveal their identity.
- The informant can refuse to answer questions they feel could identify themselves. If the informant reveals themselves at any time, the company will document who will have access to the identity. This can include the investigator(s), Whistleblowing program owner or anyone else the committee deems fit

### **Potential retaliation**

An informant might be concerned that staff, management, or the organization might retaliate against them. The company will protect the informant from:

- Being terminated or having their employment ceased;
- Biased approach towards Performance management;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can reasonably be perceived as retaliation for making a report.

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### **Considered risk of retaliation**

In the case of “considered risk of retaliation”, the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered risk of retaliation, the informant should contact the Whistleblowing program owner. Whistleblowing program owners will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant or the accused taking leave;
- The informant or the accused being reassigned to other duties; and
- The informant or the accused being reassigned to another location.

### **Already retaliated against**

If the informant feels that they have already been retaliated against, they should escalate this immediately to the Whistleblowing program owner. The Audit Committee will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant after retaliation has occurred can include:

- The informant or the accused taking leave;
- The informant or the accused being reassigned to other duties; and
- The informant or the accused being reassigned to another location.

### **Not adequately resolved**

If the informant feels their report of retaliation was not resolved adequately, the informant can escalate this case. The report will need to go to the Whistleblowing program owner and they will investigate the matter and process for how the retaliation has to be dealt with.

### **How AFIG will deals with retaliation**

AFIG does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated.

### **Performance and effectiveness in the job role**

The company can raise any issues related to work or performance incase that is a case with the informant. While the company will protect the informant from any retaliation, it is also important that they are still effective in their job. AFIG can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

### Protection & Immunity for others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

### Legislative/Regulation protection & assistance

Where the company operates from, if the jurisdiction has whistleblowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

## Section 4: Whistleblowing program’s roles and responsibility

### Roles

The roles within the company’s whistleblowing program include the following:

- Whistleblowing program owner;
- Investigators;
- Human resources who are involved in cases and made aware of specific investigations

Position	Persons in charge
Whistleblowing program owner = Whistleblowing Committee member	Sanjay Gandhi ( <a href="mailto:sanjay.gandhi@gojo.co">sanjay.gandhi@gojo.co</a> ) Nominee Director- Gojo & Co  Tara Nair ( <a href="mailto:tara01@gmail.com">tara01@gmail.com</a> ) Independent Director  Ramesh Muthuswami <a href="mailto:ramesh.muthuswami@ananyafinance.com">ramesh.muthuswami@ananyafinance.com</a> Head – Credit & Risk  Shrabanti Patel ( <a href="mailto:shrabanti.patel@ananyafinance.com">shrabanti.patel@ananyafinance.com</a> ) Associate Vice President – Human Resources
General Risk Report Lead	Ramesh Muthuswami <a href="mailto:ramesh.muthuswami@ananyafinance.com">ramesh.muthuswami@ananyafinance.com</a> Head – Credit & Risk
Investigator	Whistleblowing program owners decide the suitable person(s) in charge from internal and external resources based on the case. Whistleblowing

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program owners can conduct an investigation by themselves as well.

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## Responsibilities

The following are the responsibilities of each role in the companies whistleblowing program.

**Program owner/whistleblowing program owner:** This owner is responsible for:

- receiving the incoming anonymous reports and assigning these reports to investigators;
- employees knowing and understanding the program, including training;
- reporting results of their work directly to the Audit Committee Chair;
- ensuring anonymous reports are heard and acted upon;
- ensuring all whistleblowing cases are reported to the Audit / Risk Committee (or other relevant committees attended by the board)
- ensuring reporting all whistleblowing cases further to the Gojo Head of Internal Audit by the General Risk Manager. In case the General Risk Manager is the person accused by the whistleblowing report, then another member of the whistleblowing owners shall take charge of reporting to Gojo's Head of Internal Audit.

**Investigator:** The investigator(s) is responsible for

- making the investigation plan;
- interacting and asking questions of informants, as well as using the information provided to investigate the report submitted; and
- gathering the facts and putting forth a final report to the whistleblowing program owner on what happened and what action they feel needs to take place.

**Human resources:** Colleagues from human resources will be called upon to provide advice and guidance during any investigation. The whistleblowing program leverages their expertise and acumen to ensure that the company is using HR best practices during investigations to treat all employees fairly.

## Section 5: Governance

### Changes to the whistleblowing policy

From time to time, AFIG's whistleblowing policy will need to change to keep up with our values, best practices, improvements, as well as legislation and regulations. Any changes in the whistleblowing policy will be communicated with all employees and any relevant stakeholders.

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The Audit Committee recommends the whistleblowing policy to the Board of Directors for approval, including the Whistleblowing program owner's assignment.

All changes will also be documented in the company's whistleblowing policy and will be made available to all employees.

### Reporting to the Board of Directors

The Board of Directors has to be updated every quarter on the whistleblowing program inclusive of reports, investigations, and results. Reports or investigations carrying an undue amount of risk will be reported to the Board of Directors outside of the quarterly updates. The Board of Directors at any time can ask about anonymous reports, investigations, as well as the state of AFIG's whistleblowing program. Any board member subject to investigation will not have access to such information

The Audit Committee is responsible and accountable for the implementation and effectiveness of the whistleblowing program.

### Reporting to Share Holders:

- The General Risk Report Lead Mr. Ramesh Muthuswami is expected to report any cases received to shareholder Audit Committee using this form [General Risk Manager Incident Reporting Form \(google.com\)](#).
- The case should be reported as and when received and when concluded.

### Channels for Reporting

Channel	Contact Information
Whistleblowing/Anonymous Reporting via email to Whistleblowing owner	Any complainant can directly email their concern(s)/complaint(s) at <a href="mailto:whistleblowing@ananyafinance.com">whistleblowing@ananyafinance.com</a>  Whistleblowing program owners are: Sanjay Gandhi ( <a href="mailto:sanjay.gandhi@gojo.co">sanjay.gandhi@gojo.co</a> ) Nominee Director- Gojo & Co  Tara Nair ( <a href="mailto:tara01@gmail.com">tara01@gmail.com</a> ) Independent Director  Ramesh Muthuswami

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[ramesh.muthuswami@ananyafinance.com](mailto:ramesh.muthuswami@ananyafinance.com)  
Head – Credit & Risk

Shrabanti Patel  
([shrabanti.patel@ananyafinance.com](mailto:shrabanti.patel@ananyafinance.com))  
Associate Vice President – Human Resources

If you do not want some of them to receive your report because they are part of your report, please directly send an email to the other members of the Committee.

Whistleblowing/Anonymous Reporting via post to Whistleblowing owner	Ramesh Muthuswami 903 9th Floor Sakar - 9, Besides Old RBI Ashram Road, Ashram Rd, Ahmedabad, Gujarat 380009
Whistleblowing/Anonymous Reporting via email to senior management	Ramesh Muthuswami <a href="mailto:ramesh.muthuswami@ananyafinance.com">ramesh.muthuswami@ananyafinance.com</a> Head – Credit & Risk

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