

Whizdm Innovations Private Limited

Whistleblower Policy

Date of approval	20.09.2023
Approved by	Board of Directors
Version No.	V-2-2024
Date of last revision	11.12.2024

1. **PURPOSE**

- 1.1. Whizdm Innovations Private Limited and its subsidiaries (collectively referred as “**Moneyview**”) are committed to conduct the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior. Potential violations of Moneyview’s policies or applicable laws are matters of serious concern for Moneyview. Therefore, Moneyview has adopted this Whistleblower Policy to establish a mechanism for employees, vendors, customers, and other stakeholders to report any unethical behavior, fraud, corruption, or any other illegal activity occurring at Moneyview. This Policy aims to promote transparency, integrity, and ethical conduct within the organization.

2. **SCOPE & APPLICABILITY**

- 2.1. The Policy covers any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity, including but not limited to the following (“**Protected Disclosure**”):
- (a) Breach of Moneyview’s constitutional documents, policies and rules;
 - (b) Violation of applicable laws;
 - (c) Unethical business conduct;
 - (d) Abuse of authority;
 - (e) Bribery or corruption;
 - (f) Financial irregularities, including fraud or suspected fraud;
 - (g) Wastage or misappropriation of Moneyview’s funds and assets;
 - (h) Negligence causing substantial financial or reputational cost;
 - (i) Manipulation of Moneyview’s data or records;
 - (j) Leak of confidential or propriety information;
 - (k) Breach of IT Security and data privacy;

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- (l) Gross or wilful negligence causing substantial and specific danger to public health and safety; and
 - (m) illegal discrimination based on someone's race, colour, religion, natural origin, sex, sexual orientation or disability.
- 2.2. This Policy applies to all employees of Moneyview, employees of other agencies deployed for Moneyview's activities, whether working from any of Moneyview's offices or any other location, directors, vendors, customers, and any other stakeholders associated with Moneyview who wishes to make a Protected Disclosure ("**Whistleblower**").
- 2.3. A person belonging to any of the above-mentioned categories can use the channel provided by this Policy for raising an issue covered under this Policy.
- 2.4. This Policy should not be used in place of other Moneyview Policies for grievance redressal (including existing mechanism for personal grievances and Anti Sexual Harassment Policy for sexual harassment complaints). If such complaints are received, they shall be forwarded to respective stakeholders for action on the same.
- 3. HOW TO REPORT**
- 3.1. A Protected Disclosure should be reported by a Whistleblower in English to the human resources manager ("**Whistleblower Officer**") through a written notice or electronic mail as soon as becoming aware of the matter. The subject of the notice/electronic mail should be "Protected Disclosure under the Whistleblower Policy". While, for ease of investigation, it is preferable to have the details of the

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- Whistleblower making the Protected Disclosure, a Whistleblower may choose to report the Protected Disclosure anonymously.
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 - 3.4. A Protected Disclosure should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of concern.
 - 3.5. A Protected Disclosure must have the following details:
 - (a) Name, address and contact details of the Whistleblower, if the Whistleblower is not reporting the Protected Disclosure anonymously (including Employee ID, if the Whistleblower is an employee).
 - (b) Brief description of the malpractice, names of those alleged to have committed or about to commit a malpractice. Specific details such as time and place of occurrence are also important.
 - 3.6. The contact details of the Whistleblower Officer are as follows:

Director of HR

E-mail: HR-grievance@moneyview.in
 - 3.7. If a Protected Disclosure is received by any employee of Moneyview other than the Whistleblower Officer, the same should be forwarded to the Whistleblower Officer for further appropriate action.
 - 3.8. Appropriate care shall be taken to protect the identity of the Whistleblower.
 - 3.9. The Whistleblower Officer shall acknowledge the receipt of the Protected Disclosure as soon as practical (preferably within 10 days of receipt of a Protected Disclosure).

3.10. In case a Protected Disclosure is made and no action is initiated or the action initiated is inappropriate in the view of Whistleblower, they can duly address the concern to the Lead HR of Moneyview.

3.11. **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.**

4. INVESTIGATIONS AFTER YOU REPORT

4.1. 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 Moneyview has a duty to cooperate in the investigation of reports of violations. If, at the conclusion of its investigation, Moneyview determines that a violation has occurred, Moneyview 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, as well as cancellation of any stock options granted (vested and, or unvested) as stipulated in the respective employment agreement. Reasonable and necessary steps will also be taken to prevent any further violations of Moneyview's policies.

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

4.3. The persons named in a Protected Disclosure ("**Subject**") shall not interfere with or attempt to influence the investigation or its outcome in any manner whatsoever.

4.4. The Subject shall not in any manner, whether directly or indirectly, direct or influence another to, knowingly or unknowingly, attempt to or withhold, destroy

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- or tamper with any evidence or attempt to or influence, coach, threaten or intimidate any witness(es).
- 4.5. The Subject has the right to consult with any person of their choice other than the person conducting the investigation of the Protected Disclosure in which the Subject is named, and, or the Whistleblower. The Subject shall be free at any time to engage an external counsel at their own cost to represent them in the investigation proceedings.
 - 4.6. The Subject shall be informed of the outcome of the investigation upon the conclusion of the same.
 - 4.7. In the event, the findings of the Investigation confirm the Whistleblower's complaint, Moneyview shall take appropriate steps in respect of the Subject and the overall issues including remedying internal issues and making regulatory and statutory reporting and disclosures, as may be applicable.
 - 4.8. In the event the allegations are not confirmed by the Investigation, Moneyview shall proceed in accordance with the internal processes in this regard.
 - 4.9. A report will be provided to the Board of directors of Moneyview on an annual basis setting out the details of the Protected Disclosures made, and investigations made in that regard, in a calendar year.
- 5. PROTECTION**
- 5.1. No unfair treatment will be meted out to a Whistleblower by virtue of his/her having reported a protected disclosure under this Policy. Complete protection will be given to Whistleblowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of

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- authority to obstruct the Whistleblower's right to continue to perform his duties/functions including making further protected disclosure.
- 5.2. A Whistleblower may report any violation of the above clause to the Lead HR of Moneyview. Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.
- 5.3. The Whistleblower, the HR Team, the Subject(s) and everybody involved in the investigation process, must act in good faith and maintain confidentiality of the Protected Disclosure, the investigations and all allied matters. Any breach of this confidentiality obligation will be viewed very seriously and lead to appropriate disciplinary action.
- 5.4. **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.**
- 5.5. While it will be ensured that genuine Whistleblowers are given complete protection from any kind of unfair treatment as herein set out, any abuse of this protection may attract disciplinary action. Whistleblower, who makes any Protected Disclosure, which is subsequently found to be mala fide, frivolous, baseless, malicious, or reported otherwise than in good faith, will be subject to disciplinary action.
6. **REVIEW AND REVISION**
- 6.1. Moneyview reserves the right to rescind and/or amend this Policy and all Moneyview policies, at any time. Modification may be necessary, among other reasons, to maintain compliance with regulations and / or accommodate

organizational changes within Moneyview. Final implementation and interpretation of the policy will be at the discretion of the management.

- 6.2. It is clarified that any modifications to this Policy will not affect ongoing proceedings. All proceedings will be conducted as per the Policy which is in effect when the complaint is first made.