

## 1. Objective

The policy aims to prohibit and proactively target issues linked to employee integrity by ensuring an effective redressal mechanism. Further, it also attempts to formalise a channel for communicating any such issues faced by employees and Directors, at the workplace.

## 2. Applicability and Scope

One of the core values for the Organisation is integrity. This combined with the Company's vision "to be the most admired and respected financial services brand in the country" puts a major responsibility on all. Any dilution of this value results in a reputational risk for the Organisation, as well as a violation of its own culture and value system.

This policy clarifies what integrity means and communicates a 'Whistle Blowing' policy for the Organisation. Integrity means:

- a. a transparent and honest approach in all actions;
- b. being upfront and courageous in whatever is done;
- c. having respect and abiding by the rules and laws of the Organisation and the country, in letter and spirit; and
- d. Not allowing personal gain to cloud one's judgment and decision-making and all actions that we take on behalf of the Organisation.

Integrity also means not only doing all of the above, but also not letting anyone else violate this value.

An illustrative list of practices which are not in consonance with the value of integrity is:

- Bringing a loan which is against the Organisation's policy
- Misrepresenting the interest rate and other terms
- Inflating expenses, etc.

## 3. Registering a complaint, its investigation and resolution

1. When an employee or a Director wishes to communicate on any such matter, he may directly write to the Audit Committee by way of an email to [whistleblower@fedfina.com](mailto:whistleblower@fedfina.com) complaints or grievances received on whistleblower against President or a Director will be forwarded to the Chairperson of the Audit Committee in appropriate or exceptional cases at [chairperson.audit@fedfina.com](mailto:chairperson.audit@fedfina.com)
2. The Organisation commits that this will be accessed by the Senior Manager – Legal who in turn will ensure speedy disposal of the grievance as per the laid down time lines. This policy is in keeping with best practices around the world and gives us the courage to lay the cornerstone of a culture, which is clean and honest. Any complaints or grievances against Senior Manager-Legal should be forwarded to President.

3. All complaints or grievances of such nature will be investigated promptly and in an extremely confidential manner by the Organisation. The Organisation will ensure confidentiality of the name of the person writing in and also give him all protection if required.
4. The Organisation will ensure a resolution of each complaint within **one month**. However, in complex cases, investigations might prolong beyond this. In such an eventuality, an appropriate time frame will be fixed in consultation with the Audit Committee.
5. Any employee who is found to have compromised on his integrity, on the values or policies and rules of the Organisation will be subjected to appropriate disciplinary action, up to and including dismissal from the service of the Organisation.
6. It is expected that the person writing in confidence, puts down his name, role and location of his employment.
7. Report Reports on complaints received and action taken will be submitted to President every month and to the Audit Committee every quarter.

#### **4. Owner of the Policy**

The President of the Company is the owner of this policy and any exceptions to the policy will need to be approved by the Audit Committee.

#### **5. Policy Review**

The policy will continue to be in force unless superseded by a fresh policy. The Management of Fedbank Financial Services Ltd reserves the right to amend, abrogate, modify, rescind or reinstate the entire Policy or any part of it at any time. However, no such amendment or modification would be binding unless the same is notified to the Audit Committee of the Board.