

**Objective:**

- a) To provide for safe avenues for all directors and employees to raise concerns when violations take place directly or indirectly, intentionally or otherwise, which would bring disrepute to the organization.
- b) To provide necessary safeguards for protection to directors(s) or employee(s) or any other person from victimization for whistle blowing in good faith.

**Applicability:**

This policy shall be applicable to all employees and directors of the company.

**Main features of Whistle Blowing:**

1. **To be used for:** Reporting any serious actual or suspected frauds, concerns relating to financial matters / reporting, unethical or illegal conduct or possible violation of Code of Conduct; actions which are not in line with the applicable company policies; actions which would affect the company's image or reputation; actions which are in the nature of harassment or actions that would amount to serious improper conduct or any other genuine concern.
2. **Whistle Blowers:** A director / employee making disclosure under this policy is referred to as "Whistle Blower". The Whistle Blower has to demonstrate or provide sufficient grounds for his/her concern but should not make any malicious allegations which would result in disciplinary action.
3. **Whom to report:** The Whistle Blower (being an employee) should submit the report raising the concern either to (a) The Head – HR or (b) The Head – Compliance & Internal Control or can send an email to [vigil@samfin.in](mailto:vigil@samfin.in) with a copy to any of the above two officers (called Access Persons). If the complaint is either any one of the Access Persons, then it can be made to the Managing Director & CEO of the company. If the complaint is against the Managing Director & CEO, it can be made to the Chairman of the Audit Committee of the company. Directors, when they blow the whistle, they should send the complaining report to the Chairman of the Audit Committee.
4. **When to report:** The Whistle Blower shall raise the issue immediately / promptly but within a reasonable period of the event /action/ finding but not later than two months.
5. **How to report:** The report should include as much information about the suspected violation. Where possible, it should describe the nature of the suspected violation; the identities of the 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 Whistle Blower may be required to give further information also.

- 6. Investigation:** All reports under this policy will be investigated promptly either by the Access Persons or any Committee formed in this regard by the Access Persons. Immediately on receipt of the complaint, an acknowledgment will be given to the Whistle Blower. Based on a thorough examination of the findings, the Access Persons or the Committee formed in this regard shall submit the report to the Managing Director & CEO / Chairman of the Audit Committee. If the complaint is against any of the Directors, the Committee to investigate the complaint shall be constituted by the Chairman of the Audit Committee which may include Director(s) and /or employee(s) and the report shall be submitted to the Chairman of the Audit Committee.

If, at the conclusion of its investigation, the company determines that a violation has occurred, the company will take effective remedial action commensurate with the nature of the offence. Reasonable and necessary steps will also be taken to prevent any further violations.

**7. Safeguards against victimization:**

- a) No adverse action shall be taken or recommended against a Whistle Blower in retaliation to his blowing the whistle. Harassment/Victimization of the Whistle Blower will constitute sufficient ground for dismissal of the concerned employee.
- b) Source of information to the Whistle Blower shall be disclosed to facilitate investigation.
- c) Every effort will be made to protect the Whistle Blower's identity subject to any legal constraints that may arise from time to time.