

**WHISTLE BLOWER & VIGIL MECHANISM POLICY**

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Author of the Policy	Human Resources Department
Vetted By	Chief People Officer
Approver of the Policy	Board
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**INTRODUCTION**

Veritas Finance Limited (hereinafter referred as “ **the Company**” or “ **Veritas**”) is dedicated to upholding the highest standards of ethics, honesty, and integrity in all its operations, ensuring the trust of investors, lenders, shareholders, and stakeholders. The Company has established a comprehensive whistle blower and vigil mechanism policy (“**Policy**”) to prevent corruption, fraud, and activities detrimental to stakeholders’ interests, allowing employees, customers, and third-party intermediaries to confidentially submit Protected Disclosures without fear of reprisal. This Policy promotes a fair and transparent work environment, where any disclosed concerns are promptly addressed through appropriate actions, including disciplinary measures.

**PURPOSE**

The Company's Policy aims to create a secure environment for employees, customers, and third-party intermediaries to report serious irregularities without fear of reprisal or adverse consequences. It emphasizes that whistleblowers are not responsible for investigating or determining corrective actions but play a crucial role in bringing concerns to light. This Policy underscores the Company's zero-tolerance stance towards malpractice, non-compliance, or wrongdoing, encouraging proactive disclosure to uphold transparency and integrity. It ensures confidential and prompt investigation of reported breaches, safeguarding whistleblowers against victimization. The Policy reflects the Company's commitment to ethical conduct and open communication, fostering a culture of accountability and productivity.

**APPLICABILITY**

The Policy applies to all the Company’s employees. The Policy shall also apply to any complaints made by directors, other stakeholders of the Company such as customers and members of public.

**DEFINITIONS**

“**Alleged wrongful conduct**” shall mean violation of law, infringement of Company’s rules, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority.

“**Audit Committee**” means a committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013.

“**Board of Directors**” or “**Board**” means the Board of Directors of the Company, as constituted from time to time.

**"Director"** means a member of the Board of the Company.

**"Employee"** shall mean all persons employed by the Company (whether working in India or abroad), including present employees, Directors, delegates, and persons employed for a temporary purpose or period, or on a temporary basis.

**"Forensic audit"** shall mean an audit commenced pursuant to Regulation 30, Schedule III, Part A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the **"SEBI LODR Regulations"**), which are initiated with the objective of detecting any mis-statement in financials or mis-appropriation/ siphoning or diversion of funds.

**"Generally Available Information"** means information that is accessible to the public on a non-discriminatory basis, and "Generally Available" will be construed accordingly.

**"Good Faith"** means an employee shall be deemed to be communicating in 'good faith' if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge on a factual basis for the communication or where the employee knew or reasonably should have known that the communication about unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.

**"Personnel"** means any employee of the Company (including outsourced, temporary and on contract personnel), director and / or third-party engaged by or on-behalf of the Company. Personnel covers Directors and Employees.

**"Protected Disclosure"** means a concern raised by an employee or group of employees of the Company through a written communication made in good faith. It should disclose or demonstrate information about unethical or improper activity under the "Scope of the Policy" with respect to the Company. The disclosure should be factual, not speculative or interpretative, and contain specific information to allow for proper assessment.

**"Questionable Accounting or Auditing Matters"** include, but are not limited to:

Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company;

Fraud or deliberate error in the recording and maintaining of financial records of the Company;

Deficiencies in or non-compliance with the Company's internal accounting controls;

Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, or audit reports of the Company;

Deviation from full and fair reporting of the Company's financial condition.

**"Reportable Matters"** means Questionable Accounting or Auditing Matters (defined below), and/or any other Company matters involving abuse of authority, breach of Code of Conduct, fraud, bribery,

corruption, employee misconduct, illegality, health and safety, environmental issues, wastage/misappropriation of company funds/assets and any other unethical conduct.

**“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund.

**“Unpublished Price Sensitive Information” or ‘UPSI’** means any information, relating to the Company or its Securities, directly or indirectly, that is not Generally Available, which upon becoming Generally Available, is likely to materially affect the price of the Securities of the Company and shall, ordinarily include but not be restricted to, information relating to the following:

- a) financial results
- b) dividends
- c) change in capital structure
- d) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; and
- e) changes in Key Managerial Personnel.

**“Whistleblower”** is defined as any Director/ Employee/ customer/ vendor making a complaint/ referral under this Policy is commonly referred to as a Whistleblower. The Whistleblower’s role is as a reporting party. He/she is not an investigator. Although the Whistleblower is not expected to prove the truth of an allegation, the Whistleblower needs to reasonably demonstrate to the whistle blower committee, that there are sufficient grounds for concern. Whistle blower is called as complainant in this Policy.

#### **KEY RULES**

To ensure compliance with this Policy and to handle concerns effectively, Veritas will:

- Ensure that Whistleblowers and those handling Protected Disclosures are not subjected to any form of victimization.
- Treat any instances of victimization seriously, including taking appropriate disciplinary action against those responsible.
- Maintain strict confidentiality throughout the process of handling Protected Disclosures.
- Refrain from hiding or suppressing any evidence related to Protected Disclosures.
- Take disciplinary action against anyone who attempts to destroy or conceal evidence of a Protected Disclosure.
- Provide a fair opportunity for all involved parties, particularly the subject of the disclosure, to express their views and respond to allegations.

#### **NEED FOR THE POLICY**

All Personnel have an obligation to report any Reportable Matters, of which they are or become aware of, to the Company.

This Policy is intended to encourage and enable personnel to raise concerns within the Company prior to seeking resolution outside the Company. This Policy ensures that the Company Personnel are empowered to pro-actively bring to light such instances without fear of reprisal, discrimination or adverse employment consequences.

However, this Policy neither releases Personnel from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation. This Policy is not intended to question financial or business decisions taken by the Company that are not reportable matters nor should it be used as a means to reconsider any matters which have already been addressed pursuant to disciplinary or other internal procedures of the Company. The Whistle-blower's role is that of a reporting party. Whistle-blowers are not investigators or finders of facts; neither can they determine the appropriate corrective or remedial action that may be warranted.

### **SCOPE**

The Policy at Veritas is designed to address a broad spectrum of significant concerns that could impact the company, including but not limited to:

- Fraud, corruption, or theft, including potential avenues for such offenses.
- Abuse of authority;
- Breach of contract;
- Negligence causing substantial and specific danger to public health and safety;
- Manipulation of company data/records;
- Financial irregularities, including fraud or suspected fraud or deficiencies in internal control and check or deliberate error in preparations of financial statements or misrepresentation of financial reports;
- Pilferage of confidential/propriety information;
- Deliberate violation of law/regulation;
- Wastage / misappropriation of company funds/assets;
- Bribery or corruption;
- Retaliation;
- Breach of IT Security and data privacy;
- Social media misuse;
- Breach of company policy or failure to implement or comply with any approved company policy.

- Questionable accounting practices, auditing matters, and concerns over internal controls or disclosures.
- Intentional concealment or fraudulent reporting of financial or other information to investors, shareholders, regulatory authorities, and other stakeholders.
- Deviations from established processes.
- Employee misconduct.
- Environmental, health, and safety issues posing risks to employees or the public.
- Non-compliance with laws, regulations, and the Company's Code of Conduct.

The following concerns are not covered by the Policy:

- Complaints that are frivolous in nature;
- Issues relating to personal grievance (increment, promotion, etc.); and
- Sexual harassment as it is covered by Anti-Sexual Harassment Policy. If the Internal Complaint Committee receives a sexual harassment complaint, it should be forwarded to Sexual Harassment Committee set up for this purpose on the basis of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

If such complaints are received, they shall be forwarded to respective stakeholders for action on the same.

The Policy should not be used for raising malicious or unfounded allegations against colleagues or superiors. The above should be supported by proper evidence and reliable information. Care should be taken not to indulge in baseless allegation and should not be used in place of the Company's grievance procedures.

If a complaint, after an investigation proves to be frivolous, malicious or made with an ulterior intent, the Audit Committee shall take appropriate disciplinary against the concerned Whistle Blower.

Any Employee and/or Director, knowingly hiding information in any form regarding any unethical practice/activities/behaviour in one's workplace will also constitute unethical practice on the Employee's part.

#### **WHISTLE BLOWER ENQUIRY TEAM (WBET)**

Audit Committee shall operate and review the functioning of the Vigil Mechanism.

The Committee shall handle all complaints with independence and fairness, ensuring no conflict of interest in the investigation. In appropriate or exceptional cases, direct access to the Chairman of the Audit Committee will be permitted as below

- 1) Complaints by or against Directors will be dealt with by the Chairperson of the Audit Committee of the Board. Whistle Blowers can have direct access to the Chairperson of the Audit Committee.
- 2) If the whistleblower believes that any member of the Committee is involved in the suspected violation, the complaint may be made directly to the Chairman of the Audit Committee or the Board.

The Audit Committee will appoint a Whistle Blower Enquiry Team ("**WBET**") to receive and act on all reports or Protected Disclosures made under this Policy. WBET will comprise three members responsible for receiving all protected disclosures, maintaining confidentiality, and ensuring appropriate action. WBET is empowered to appoint an enquiry committee as needed to conduct investigations and fact-finding processes. The members of this Committee should exhibit fairness, objectivity, thoroughness, ethical behavior, and high standards of professionalism. Depending on the nature of the Protected Disclosure, WBET can also appoint independent investigators at its discretion for fact-finding purposes.

Appropriate corrective action will be taken if warranted by the investigation, in the Company's sole discretion. Any actions taken in response to a Protected Disclosure will be informed to the Whistle-blower to the extent allowed by law or warranted by the specific situation, unless the Protected Disclosure was submitted on an anonymous basis. The Audit Committee will maintain all Protected Disclosure received, tracking their receipt, investigation and resolution. All Protected Disclosure will be properly investigated, and a proper follow-up will be conducted.

Any member of the Audit Committee or other officer with a conflict of interest must disclose their concern or interest immediately and shall not deal with the matter.

#### **WHISTLE BLOWING PROCEDURE**

The whistle blowing procedure is intended for genuine, serious, and sensitive issues. Only genuine and serious concerns of the nature set out in this Policy should be reported to the Committee.

- 1) Personnel should raise Reportable Matters with someone in a position to address them appropriately, typically a supervisor or manager. Supervisors or managers to whom



Reportable Matters are raised must report them immediately to the WBET.

Personnel can lodge a protected disclosure in the following ways:

By contacting any member of the WBET or anyone in management whom the Whistleblower is comfortable approaching.

In line with the objectives of the Policy, routine grievances from customers /vendors shall be dealt with by the customer / vendor grievance mechanism of the Company and shall not be covered under this Policy. With respect to referrals from customer / vendors, those alleging corruption charges and reputational risks will be dealt with under the Policy.

For complaints by or against Directors/any members of WBET/Chairman (To be marked as "Private and Confidential")	Chairman of the Audit Committee SKCL, Central Square 1, South and North Wing, 7 <sup>th</sup> Floor, Unit C28-C35, CIPET Road, Thiru Vi ka Industrial Estate, Guindy, Chennai-600032. Email: <a href="mailto:acb.chairman@veritasfin.in">acb.chairman@veritasfin.in</a>
For complaints against Audit Committee Chairman	Chairman of the Board SKCL, Central Square 1, South and North Wing, 7 <sup>th</sup> Floor, Unit C28-C35, CIPET Road, Thiru Vi ka Industrial Estate, Guindy, Chennai-600032. Email: <a href="mailto:chairman.rvv@veritasfin.in">chairman.rvv@veritasfin.in</a>
For complaints against employees, vendors, customers	WBET Members of the Committee 1) Managing Director & CEO 2) Chief People Officer 3) Company Secretary & Compliance Officer SKCL, Central Square 1, South and North Wing, 7 <sup>th</sup> Floor, Unit C28-C35, CIPET Road, Thiru Vi ka Industrial Estate, Guindy, Chennai-600032. Email: <a href="mailto:whistleblower@veritasfin.in">whistleblower@veritasfin.in</a>

By sending a Protected Disclosure letter in a sealed envelope marked "Protected disclosure under

Whistle Blower policy" to the WBET or hierarchy as stated above. If the complaint is not superscribed and closed as mentioned, it will not be possible for the Audit Committee to protect the whistleblower, and the protected disclosure will be dealt with as a normal disclosure.

A Protected Disclosure may be made anonymously. If made anonymously, the whistleblower must provide detailed information and the basis for making the assertion.

### **PROTECTED DISCLOSURES**

Although a Whistleblower is not required to furnish any more information than what he/she wishes to disclose, it is essential for the Company to have all critical information in order to enable the Company to effectively evaluate and investigate the Protected Disclosure. It is difficult for the Company to proceed with an investigation into a Protected Disclosure, particularly an anonymous Protected Disclosure, which does not contain all the critical information such as the specific charge. The Protected Disclosure or disclosure must therefore provide as much detail and be as specific as possible, including names and dates, in order to facilitate the investigation.

To the extent possible, the Protected Disclosure or disclosure must include the following:

1. The name of the employee, and/or outside party or parties involved;
2. Where it happened (division or office or location);
3. When did it happen: a date or a period of time;
4. Type of concern (what happened);

Financial reporting;

- Legal matter;
- Management action;
- Employee misconduct; and/or unethical behaviour
- involve leakage of Unpublished Price Sensitive Information
- May lead to incorrect financial reporting;
- Are not in line with applicable Company policy
- Involve any instance of bribery, embezzlement or misappropriation;
- Amount to actual or suspected fraud;
- Health and safety and environmental issues.
- Are unlawful or;
- Otherwise amount to serious improper conduct

4. Submit proof or identify where proof can be found, if possible;

5. Who to contact for more information, if possible/ other witnesses; and/or
6. Prior efforts to address the problem, if any.

**INVESTIGATION**

To protect the identity of the Whistleblower, WBET/Chairman/Chairman of the Audit Committee will not issue any written acknowledgment of receipt of the Protected Disclosure. Upon verifying facts, WBET/Chairman/Chairman of the Audit Committee will take necessary action and may request additional information from the Whistleblower if available.

In cases of anonymous Protected Disclosures, discreet inquiries will be made to determine the basis for further action.

Based on the inquiry or the Protected Disclosure itself, if WBET/Chairman/Chairman of the Audit Committee decides further investigation is warranted, appropriate action will be initiated. If initial inquiries indicate no basis for concern or if not within Policy scope, this decision will be documented.

Further investigation will proceed if:

- The concern involves unethical activity based on initial inquiry.
- The concern falls within the Policy's purview.
- This investigation is not accusatory but a fact-finding process. The outcome may not conclude an improper or unethical act.

All information disclosed during the investigation will remain confidential, except as necessary to conduct the investigation and take remedial action, complying with applicable laws.

The Company reserves the right to refer concerns or Protected Disclosures to external regulatory authorities. Personnel must cooperate in investigations.

Investigations are typically completed within 90 days from receiving the Protected Disclosure, with action documented within 10 days thereafter.

Complaints related to Improper Practices involving Sensitive Information will be investigated under this Policy.

The Committee collaborates with the necessary team under this Policy to ensure protections for the whistleblower.

When further investigation is deemed necessary, the Committee conducts a fair, neutral fact-finding process without presumption of guilt. A written report of the findings will be prepared.

**RETALIATION**

No Personnel who, in Good Faith, makes a disclosure or lodges a Protected Disclosure in accordance with this Policy shall suffer reprisal, discrimination or adverse employment consequences. The Company strictly prohibits discrimination, retaliation or harassment of any kind, against

Whistleblower who, based on his/her reasonable belief that one or more Reportable Matters has occurred or are occurring, reports that information.

If any Personnel who makes a disclosure or Protected Disclosure in good faith, believes that he/she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he/she must immediately report those facts to his/her supervisor or manager. If, for any reason, he/she does not feel comfortable discussing the matter with these persons, he/she should bring the matter to the attention of the WBET.

### **FALSE ALLEGATIONS AND LEGITIMATE EMPLOYEE ACTION**

Employees or vendors who knowingly make false allegations of unethical and improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies, and procedures.

This Policy may not be used as a defense by an employee against whom an adverse personnel action has been taken independently of any disclosure of information by them and for legitimate reasons or cause under Company rules and policies.

The whistleblower must put their names to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified.

Concerns expressed anonymously will not usually be investigated. However, subject to the seriousness of the issue raised, the Committee can initiate an investigation independently.

Malicious, frivolous, or baseless allegations by Employees or Directors will result in disciplinary action against such Employees or Directors.

### **DECISION & REPORTING**

If an investigation leads the WBET or the Chairman of the Audit Committee or Chairman of the Board to conclude that an improper or unethical act has been committed, the WBET or the Chairman of the Audit Committee or Chairman of the Board shall recommend to the Board of Directors to take appropriate disciplinary or corrective action.

Any action initiated against the Personnel as a result of the investigation's findings shall adhere to the applicable personnel or staff conduct and disciplinary procedures, and the remedial action will

be proportional to the severity of the offense.

In case the Personnel is the Chairman of the Audit Committee or Chairman of the Board, MD, or CEO of the Company, the Chairman of the Board and/or the Chairman of the Audit Committee (as applicable) shall forward the protected disclosure to other members of the Audit Committee if deemed fit. The Audit Committee shall promptly and appropriately investigate the Protected Disclosure. If the investigation report is unsatisfactory to the whistleblower, he/she has the right to report the event to the appropriate legal or investigating agency.

The WBET shall submit reports to the Audit Committee for all complaints received under this Policy.

If the report by the WBET concludes that a serious breach, as alleged in a Complaint, has been committed, it shall recommend to the Audit Committee, as appropriate, to take suitable disciplinary action against the concerned Personnel.

If WBET determines that a Complaint made under this Policy is false or made in bad faith, it shall recommend to the Audit Committee, as appropriate, to take suitable action against the concerned Whistleblower.

The Company may also take reasonable and necessary measures to prevent any further violations, which may have resulted in a Protected Disclosure being made. In some situations, the Company may be legally obligated to refer matters to appropriate external regulatory authorities.

**ROLE OF WBET:**

- a. Policy implementation is ensured by WBET /HR.
- b. Ascertain the credibility of the charge or complaint, based on the facts set out in the complaint and a reasonably conducted preliminary investigation and enquiry. If such initial enquiry reasonably indicates further investigation is not required, close the issue.
- c. In case of complaint received in relation to an Improper Practice that involves leakage of Unpublished Price Sensitive Information, to undertake the specifications set forth under the head "Investigation" above
- d. Document all complaints, enquiries and the steps taken into address the complaint.
- e. Where further investigation is indicated carry this through, appointing a committee if necessary.
- f. Provide quarterly reports to the Audit Committee

- g.** Acknowledge receipt of concern to the Complainant
- h.** Ensure that necessary safeguards are provided to the Complainant to protect him/ her from any retaliation, harassment and victimisation.
- i.** Conduct the enquiry in a fair, unbiased manner . Ensure complete fact-finding.
- j.** Maintain strict confidentiality.
- k.** Document the investigation thoroughly, including all facts, evidences, discussions and finding, including whether an Improper Practice has been committed and if so by whom.
- l.** Recommend an appropriate course of action to the Audit Committee - suggested disciplinary action, including dismissal, and preventive measures and other appropriate measures.
- m.** Minute Committee deliberations and document the final report.

### **DOCUMENT RETENTION**

The Company shall maintain documentation of all Protected Disclosures or reports, subject to this Policy. The documentation shall include any written submissions provided by the complainant, any other Company documents identified in the Protected Disclosure or by the Company as relevant to the Protected Disclosure, a summary of the date and manner in which the Protected Disclosure was received by the Company and any response by the Company to the complainant. All such documentation shall be retained by the Company for a minimum of eight (8) years from the date of receipt of the Protected Disclosure. Confidentiality will be maintained to the extent reasonably practicable depending on the requirements and nature of the investigation, as indicated above.

### **REPORTING**

A consolidated quarterly report on the Protected Disclosures received along with the details on findings and action taken must be presented to the Audit Committee and Board of the company.

### **SECRECY / CONFIDENTIALITY**

Personnel may make a Protected Disclosure on confidential basis or may make submissions anonymously. In addition, Personnel should be aware that there are significant rights and protections available to individuals who identify themselves when making a Protected Disclosure, and that these rights and protections may be lost if Personnel make a Protected Disclosure on an anonymous basis.

Therefore, the Company encourages all Personnel to identify themselves when making a Protected

Disclosure.

In responding to anonymous Protected Disclosure, due regard will be paid to:

- The fairness to any individual named in the anonymous Protected Disclosure
- The seriousness of the issue raised
- The credibility of the information or allegation in the Protected Disclosure; and
- The ability to ascertain the validity of the Protected Disclosure and to appropriately resolve it without the assistance and cooperation of the Whistleblower.
- Ensure complete fact-finding
- Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures

### **COMMUNICATION**

The existence of this Policy will be communicated to all stakeholders and a copy of this Policy can be obtained from the Company on demand. A soft copy of the latest version of the Policy will be made available on the Company's website.

### **INTERPRETATION**

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the amended Companies Act, 2013 and/or RBI or SEBI Regulations and/or any other statutory Regulation(s) as amended from time to time.

### **ADMINISTRATION AND REVIEW OF THE POLICY**

The Board of Directors shall be responsible for the administration, interpretation, application and review of this Policy. The Board also shall be empowered to bring about necessary changes to this Policy, if required at any stage with the concurrence of the Audit Committee.

### **AMENDMENT**

The Audit Committee/Board of Directors may modify this Policy at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with regulations and/or accommodate organisational changes within the Company. However, no such amendment or modification will be binding on the Employees and directors unless the same is notified to them in writing or communicated via e-mail.

Whilst the Company has made best efforts to define detailed procedures for implementation of this

Policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad intent of the Policy. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.

**MANDATORY DISPLAY OF THE POLICY**

A copy of the Policy shall be displayed by all Offices of the Company at a prominent place inside the Company's premises and on the Company's website i.e. <https://www.veritasfin.in/>.

**Enclosures:**

Annexure I- Format of Whistle Blower Complaint

Annexure II- Process Flow



**Annexure-I**  
**FORMAT FOR WHISTLE BLOWING**

<b>DATE</b>	
<b>NAME OF THE EMPLOYEE/DIRECTOR</b>	
<b>E- MAIL ID OF THE EMPLOYEE/DIRECTOR</b>	
<b>COMMUNICATION ADDRESS</b>	
<b>CONTACT NO</b>	
<b>SUBJECT MATTER WHICH IS REPORTED</b>	
<b>(NAME OF THE PERSON/ EVENT FOCUSED AT)</b>	
<b>BRIEF ABOUT THE CONCERN</b>	
<b>EVIDENCE (ENCLOSE, IF ANY)</b>	

SIGNATURE

**Note: The whistle blowing shall be submitted at least within 30 days of the occurrence of the concern/event.**

**Annexure -II  
PROCESS FLOW OF WHISTLE BLOWER**

