

EDME INSURANCE BROKERS LIMITED
(FORMERLY KNOWN AS ADITYA BIRLA INSURANCE BROKERS LIMITED)

POLICY TITLE	Whistle Blower Policy
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POLICY DETAILS

Policy Owner	<i>Human Resource</i>
Policy Author	<i>Human Resource</i>
Document Reference Code	<i>HR/POL/001/2014-2015</i>
Approved by	<i>Board of Directors</i>
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Effective date	<i>January 28, 2025</i>
Version number	<i>1.5</i>
Reason for last change	<i>Change in Committee Members and delegation of Board's power to CEO for review</i>
Issue date	<i>January 28, 2025</i>
Issued to	<i>All Employees & General Public</i>
For	<i>Final Issuance</i>

Edme Insurance Brokers Ltd.
(Formerly Aditya Birla Insurance Brokers Ltd.)

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Senapati Bapat Marg, Elphinstone Road, Mumbai 400 013, Maharashtra, India
T: +91 22 4356 8585 | E: care@edmeinsurance.com | W: www.edmeinsurance.com

Registered Office: Indian Rayon Compound, Veraval 362 266, Gujarat, India

CIN: U99999GJ2001PLC062239 | IRDAI Registration Number: 146 | License Validity: 9th April, 2027 | Broker Category: Composite Broker
ISO 9001 Quality Management Certificate certified by Intertek Certification Ltd. Under certificate number 0145476

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PREAMBLE

EDME Code of Conduct policy requires management and all other employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the company, or any of its subsidiaries, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable policies, procedures, laws and regulations.

PURPOSE

The purpose of the whistle blower policy is as follows:

1. To encourage the employees to report to the management about suspected unethical behaviors, malpractices, wrongful conduct, fraud violation of the company's policies, violation of law by any employee in the company without any fear of retaliation.
2. To build and strengthen a culture of transparency and trust in the organization.

APPLICABILITY

This policy applies to all the employees (including outsourced, temporary and on contract personnel) and ex-employees of Aditya Birla Insurance Broker's Limited as well as stakeholders of the Company, including agents, policyholders, Vendors (hereinafter referred to as Whistle Blower).

This policy encourages all the Whistleblowers to come out with their complaints in regard to any kind of misuse of company's properties, mismanagement or wrongful conduct prevailing in the company, if any.

MAKING A DISCLOSURE

1. Any Whistle Blower through written communication, complete with related evidence can send their observation of actual facts to one or more EDME Grievances and disciplinary committee members. The whistleblower may alternatively report the incident to his/her functional head or manager who will then report it (in writing) to the EDME Grievances and disciplinary committee members. In case of urgent matters, the whistle blower may communicate verbally (through phone or in person) but needs to put the case in writing as well.

Incidents/Complaints may be reported to whistleblower@edmeinsurance.com. The EDME Grievances and Disciplinary Committee members are as listed below:

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Name	Designation	Contact Details
Mr. Nilay Pratik	Chairperson	nilay@samaracapital.com
Mr. Sanjay Radhakrishnan	Member	sanjay.radhakrishnan@edmeinsurance.com
Mr. Anurag Dharnidharka	Member	anurag.dharnidharka@edmeinsurance.com
Mr. Yash Sinha	Secretary	yash.sinha@edmeinsurance.com

The incidents can also be reported in writing/sealed envelope to:

Head - Human Resource
Edme Insurance Brokers Limited
One World Centre, Tower-1, 7th Floor,
Jupiter Mill Compound, 841,
Senapati Bapat Marg,
Elphinstone Road,
Mumbai - 400013

2. The Complaint should, to the extent possible contain the following:

- The alleged event, matter or issue that is the subject of the Complaint;
- The name(s) of the person(s) involved;
- If the Complaint involves a specific event or events, the approximate time and location of each event; and
- Any additional information, documentation or other evidence available to support the Complaint.

To the extent that it can be provided without compromising the desire for anonymity,

3. The information on suspected wrongful conduct should be such information which the whistleblower in good faith, believes, evidences any of the following:

- Violation of any law or regulations, policies including but not limited to corruption, bribery, Theft, fraud, coercion and willful omission.
- Rebating of Commission/benefit or conflict of interest.
- Procurement frauds.
- Mismanagement, Gross wastage or misappropriation of company funds/assets.
- Manipulation of Company data/records.
- Misappropriating cash/company assets; leaking confidential or proprietary information.
- Unofficial use of Company's property/human assets.
- Activities violating Company policies (including Code of Conduct policy)

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- A substantial and specific danger to public health and safety.
- An abuse of authority or fraud
- An act of discrimination or sexual harassment.

The above list is illustrative and should not be considered as exhaustive.

4. The Whistle Blower's role is limited to that of a reporting party with reliable evidence. They are not required or expected to act as investigators or determine the appropriate corrective or remedial action that may be warranted in a given case.
5. If a protected disclosure is received by any executive of the Company other than the CEO or the EDME Grievances and disciplinary committee members, the same should be forwarded to the EDME Grievances and disciplinary committee.

DISCLOSURE INVESTIGATION PROCEDURES

The EDME Grievances and disciplinary committee members, after proper scrutiny, must investigate as per the EDME Grievances and disciplinary committee charter upon receipt of the complaint. The members will ascertain the correctness and trueness of the complaint and shall recommend necessary corrective measures /disposal as follows: -

1. Closing the complaint if wrongful conduct remains largely unsubstantiated.
2. If the complaint is found correct on investigation, action against concerned persons be suggested to HR.
3. To overcome system or control weakness, making it more stringent recommending other policies, or procedures.
4. Management, on the basis of the recommendation of the EDME Grievances and disciplinary committee, shall take appropriate action immediately.

CONFIDENTIALITY

Disclosure of wrongful conduct may be made on a confidential basis. Such disclosures will be kept confidential to the extent possible, convenient with the need to conduct an adequate investigation and legal stipulation.

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PROTECTION AGAINST VICTIMIZATION

No adverse action shall be taken against the whistleblower in “knowing retaliation” who makes any good-faith disclosure of suspect or wrongful conduct to the EDME Grievances and disciplinary committee.

APPROVAL

The policy is approved by the CEO. The policy may be reviewed internally on annual basis and if changes required, it shall be placed before the CEO for its Approval.