

Whistle Blower Policy

Objective

The Whistle Blower Policy has been put in place to ensure reporting of Suspected Legal violations / fraudulent or irregular conduct of an employee or business associate of the Company.

Introduction

Community Finance Pvt. Ltd. (CFPL) upholds the highest standards of Integrity in all its employee and business interactions. Each one of us should work with absolute honesty and professional integrity, creating an environment of trust and transparency. This policy advises employees of CFPL to follow the process and encourages them to report suspected legal violations, fraudulent or irregular conduct of an employee or business associate of the Company. Such incidents, if not reported would breach trust and endanger the Company's reputation and, in some cases, even its license to conduct business. The employee raising the issue is referred to as a 'Whistle Blower' in common corporate parlance.

Employees raising a concern or report will be provided safeguards for protection from reprisals or victimization for reporting suspected concerns in good faith. Harassment or victimization of the complainant will attract severe disciplinary action. Every effort will be made to protect the identity of the complainant subject to legal constraints / guidelines.

Apart there is a separate Policy on Values and Code of Conduct which needs to be read in conjunction with this Policy.

What issues does this policy cover?

This policy is intended to cover serious concerns that could have a large impact on the Company such actions (actual, planned, or suspected) that could lead to the following:

- Company policy violation
- Statutory violations
- Any Fraudulent action
- Misstatement of financials
- Misstatement of business metrics
- Serious improper conduct / code of ethics violation

Employees making the complaint may need to demonstrate that there are sufficient grounds for the complaint. Frivolous or malicious allegations made without basis can attract disciplinary action. Reporting the concern does not provide immunity if the complainant is himself / herself part of the offence.

To whom should the issue be reported to?

If you suspect a possible violation of a law, regulation or company ethical standard, you should promptly contact any of the following:

- Human Resource Head;
- Chief Finance Officer; or
- Managing Director

How should the issue be reported?

Employees may report the issue in the following ways:

Email: Send email directly by name to the above individuals

Post: Write a letter addressed to the concerned individual, marking the envelope “Confidential”.

The address is as furnished below:

Community Finance Private Limited.
624, 6th Floor, C1, Commercial Building No. 1,
Soham Plaza, Manpada, Ghodbunder Road,
Thane (West) – 400 610.

Website: Write through our official website. www.communityfinance.in

How will the Company deal with a report?

The Company undertakes to

- Conduct a prompt and thorough investigation of any alleged violation and take appropriate action
- Prohibit retaliatory action against an employee for making in good faith a report of a suspected violation or for providing information in connection with an internal investigation or for providing information to a government agency
- Take appropriate corrective action against individuals who have broken any laws or regulations, who have failed to report a violation or who have engaged in retaliatory conduct prohibited by this policy.

The Company will, based on the nature of the issue, appoint appropriate individuals to investigate the issue and submit a report.

- The findings will be reviewed by a committee consisting of at least 2 members from Chief Finance Officer, Chief Risk Officer, Chief Sales and Marketing Officer, Chief Information Officer along with the Human Resource representative (presently Sr.Vice President – Central Services) who will recommend the appropriate action to be taken.
- Person from the same Function / Department as the one being investigated cannot be part of the Committee. Any exception needs to be approved by the Managing Director.
- Final decision on the action rests with the Managing Director
- The Whistle Blower will be advised on conclusion of the review.

The Committee will update the Managing Director periodically on issues raised and status on action, who in turn will update the Board of the same.

Can the report be anonymous?

The employee reporting the issue should declare his / her identity while making the report. Anonymous complaints will not be entertained. As stated, Employees raising a concern or report will be provided safeguards for protection from reprisals or victimization for reporting suspected concerns in good faith. Harassment or victimization of the complainant will attract severe disciplinary action. Every effort will be made to protect the identity of the complainant subject to legal constraints.