

## Whistleblower Policy

### 1. Objective

To align the policy with the provisions of Companies Act 2013 and SEBI (Prohibition of Insider Trading) Regulations, 2015.

### 2. Eligibility

All employees of Axis AMC.

### 3. Policy

This is with respect to the Whistleblower Policy with reference no. Policy/HR/AxisMF/0086C issued on May 05, 2020. This is being modified with effect from August 01, 2024. The modification is done in the members of the committee and also includes introduction/modification of certain clauses to further strengthen the policy in the company.

### 4. Preamble

The Section 177(9) of Companies Act, 2013 & Rule 7 of Companies (Meeting of Board & its Powers) rules, 2013 mandates every listed company and such other class of companies, as may be prescribed, to establish a policy for directors and employees to report genuine concerns in such manner as may be prescribed. The Company has adopted a Code of Conduct (“the Code”), which lays down the principles and standards that should govern the actions of the Company and its employees. Any actual or potential violation of the Code, howsoever insignificant or perceived as such, is a matter of serious concern for the Company. This Policy sets out the current version of the ‘Whistleblower Policy’ which has been framed and adopted by Axis Asset Management Company Ltd. (“**Company**”) in terms of the applicable law.

The policy was adopted by the Company in July, 2010 and has been periodically reviewed and revised. This policy gives Whistleblowers (as defined herein) a platform to report Protected Disclosures (as defined herein) without fear of retribution or vengeful action from the persons against whom the complaint was submitted, in addition to providing for requisite actions to be taken on a complaint being received by the Company.

The Policy has been referred to in the Code of Conduct and Ethics Policy (as defined hereinafter) and is hosted on the Axis AMC website as well as in the HRMS under the Policies. All employees are required to submit annual declarations of having read and understood this policy. The potential Whistleblowers are advised to go through the policy's contents carefully and exercise their rights judiciously.

## 5. Preface

To ensure that the highest standards are maintained in these aspects on an ongoing basis and to provide safeguards to various stakeholders, the Company has formulated the Policy that provides whistleblowers with the opportunity to address serious concerns arising from actual or suspected occurrence(s) of illegal, unethical, or inappropriate action(s), behaviour(s), or practice(s) committed by any subject (as defined herein) as per the process detailed in this policy. It shall be the duty of every Employee, and the Company encourages all Whistleblowers (defined hereinafter), to blow the whistle i.e., to immediately communicate any actual or suspected occurrence(s) of illegal, unethical, or inappropriate action(s), wrongdoing(s), behaviour(s), or practice(s) by a Subject without fear of retribution. In case the offences are committed by senior management, this policy enables the whistleblower to report the concerns to the Audit Committee (as defined hereinafter).

## 6. Glossary of Terms

- 6.1. “**Audit Committee**” shall mean the Audit Committee of the Board of Directors of the Company constituted by the Company
- 6.2. “**Board**” means the Board of Directors of the Company.
- 6.3. “**Code**” means code of conduct of Axis Asset Management Company
- 6.4. “**Committee(s)**” shall mean collectively the Audit Committee or the Whistleblower Committee, as applicable.
- 6.5. “**Conflict of Interest Policy**” shall mean the Conflict-of-Interest Management Policy of the Company, as may be amended from time to time.
- 6.6. “**Misconduct**” 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”. “Conflict of Interest Policy” shall mean the Conflict-of-Interest Management Policy of the company, as may be amended from time to time.
- 6.7. “**Designated Authority**” refers to the Whistleblower Committee or the Chairperson of the Audit Committee of the Board.
- 6.8. “**Director**” refers to a member of the board of directors of the company.
- 6.9. “**Employee**” refers to the employee of the Company on a full time, part-time or contractual basis in India or overseas.
- 6.10. “**Internal Complaints Committee**” shall mean the committee set up to deal with matters regarding sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.
- 6.11. “**Protected Disclosure**” shall mean any communication by a Whistleblower, made in good faith, relating to any matter specified under Clause 8 of the Policy (provided such matters are not covered under the exclusions set out under Clause 9 of the Policy)
- 6.12. “**Subject**” refers to an Employee, or Director in respect of whom a Protected Disclosure has been made in terms of this Policy.
- 6.13. “**Third-Party Stakeholder**” refers to customers, shareholders, depositors, vendors, suppliers, contractors, or agencies providing goods or services to the Company.
- 6.14. “**Whistleblower**” refers to a director, employee, third-party stakeholder, or any other person who makes a Protected Disclosure of any actual or suspected occurrence(s) of illegal, unethical

or inappropriate action(s), behaviour(s) or practice(s) by a Subject in relation to the business, operations, or affairs of the Company, in the form and manner as provided in the policy

6.15. “**Whistleblower Committee**” shall mean the whistleblower committee of the company.

## 7. Policy Objectives

7.1. The Company is committed to developing a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct.

7.2. The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its directors/employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

7.3. Whistleblower policy provides a channel to the Directors, Trustees, employees and other stakeholders to report to the management concerns about unethical behaviour, actual or suspected fraud or violation of the Codes of conduct or policy. The mechanism provides for adequate safeguards against victimization of Whistleblower to avail of the mechanism and also provide for direct access to the Chairperson of the Audit Committee in exceptional cases.

7.4. This neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations about a personal situation.

## 8. Scope, coverage and exclusions of the Whistleblower policy

As stated above, the Policy is applicable to Protected Disclosures with respect to actual or suspected occurrence(s) of illegal, unethical, or inappropriate action(s), behaviour (s), or practice(s) committed by any Subject including the following (the list given below is only an indicative list and not exhaustive in nature):

8.1. Misuse of office and authority **committing any fraudulent, malafide, illegal activities.**

8.2. Violation of internal accounting/ internal control/ operational guidelines/policies, policy on Governance Framework for Financial Benchmark Submission etc.

8.3. Any fraud in preparation of financial statement of the Company

8.4. Manipulation of data/ documents

8.5. Leakage/ suspected leakage of unpublished price sensitive information in violation of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

8.6. Failure to comply with legal, compliance and regulatory requirements

8.7. Misappropriation of funds

8.8. Actual or suspected fraud or irregularities including forgery or alteration of documents

8.9. Any unlawful act, whether criminal or civil offences committed or likely to be committed that may implicate the Company or otherwise adversely affect its reputation

8.10. Discrimination against a member of staff, service recipient or service provider on grounds of sex, caste, sexual orientation, gender, creed, religion or disability

8.11. Violations of the laid down policies, rules, regulations, communicated procedures of the Company, including the following policies:

- Code and Conduct and Ethics policy;
- Conflict of Interest policy;



- Insider Trading policy;
  - Prevention of Sexual Harassment at Workplace Policy (subject to exclusions specified under this Clause below);
  - KYC/AML policies;
  - Anti-Bribery Policy
- 8.12.** Data breach and/or unauthorised disclosure of Company's proprietary data including customer data.
- 8.13.** Any other form of inappropriate/unethical/unlawful action or conduct of a Subject (conduct may be considered unethical if it undermines universal core ethical values such as integrity and honesty), including if such act has a potential to cause financial or reputational loss to the Company
- 8.14.** Complaints of sexual harassment received by the Whistleblower Committee will be referred to the "Internal Complaints Committee" set up for this purpose on the basis of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013", passed by the Government of India in December 2013.
- 8.15.** Violation of central/ state laws, rules, regulations, and/ or any other regulatory/ judicial directives.

## Exclusions:

The following types of complaints are excluded from the scope of this Policy:

- a.** Repetitive complaints which are largely unsubstantiated without any value addition, the Whistleblower Committee reserves the right not to entertain the same.
- b.** Complaints which are vague, ambiguous and do not contain specific and verifiable information so as to establish a prima facie case for investigation.
- c.** Complaints which are personal and are not related to the business, operations, or affairs of the company.
- d.** Complaints of sexual harassment which will require to be filed and which shall be dealt with in accordance with Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 and the POSH Policy of the Company.
- e.** Complaints which have been made by an Employee and/or a Third-Party Stakeholder and/ any other departments/forums of the Company (and such complaint has not been made to the Company's Whistleblower forum/ Committee(s) by the complainant as a protected disclosure or in the capacity of a whistleblower). Complaints made to such other departments/forums may be referred to the applicable investigations department directly by the departments/channels receiving the complaint and the complaint would be dealt with as per the extant/existing process.
- f.** Behavioural complaints, such as complaints relating to personal grievances and/or grievances related to performance, transfers, appraisals, compensation, promotions, rating, discrimination against a member of staff, service recipient or service provider on the grounds of sex, caste, sexual orientation, gender, creed, religion, or disability, behavioural issues/concerns of the manager(s)/supervisor(s)/other colleague(s) etc., other workplace related behavioural complaints for which alternate internal redressal mechanisms in the company are in place (Whistleblower mechanism will cover only complaints where fraudulent, illegal or malafide practices are alleged in dealing with such

matters). Complaints related to behavioural matters can be reported under the Staff Accountability Framework to:

1. Manager, or
2. Skip-level Manager, or
3. Human Resources Department/HR Relationship Manager or,
4. HR mail id **HR@axismf.com**

## **9. Roles and Duties of the Whistleblower**

- 9.1. A Whistleblower is a person who makes a Protected Disclosure, without acting as an investigator and cannot, therefore, require or instruct the investigation to be conducted as per the Whistleblower's own will, nor does he/she have a right to participate in any investigative activity other than to the extent that his/ her cooperation is sought by the Designated Authority or the Audit Committee of the Board.
- 9.2. The Whistleblower will not determine corrective or remedial action that may be warranted with respect to a Protected Disclosure.
- 9.3. The Whistleblower should provide specific and verifiable details in the Protected Disclosure in appropriate language that is not offensive.
- 9.4. The Whistleblower can seek clarifications with respect to this Policy, including the Whistleblower's role and the implications of submitting the Protected Disclosure from the Whistleblower Committee (Whistleblower@axismf.com). The final decision to make the Protected Disclosure will, however, be solely that of the Whistleblower.
- 9.5. Though the Whistleblower would not necessarily be required to conclusively prove the points contained in the Protected Disclosure, in order to support such disclosure, the Whistleblower should provide all available evidence (which should be specific and verifiable and relate to the business, operations or affairs of the Company) to establish a prima facie case for investigation.

## **10. PROTECTION AVAILABLE TO THE WHISTLEBLOWER:**

- 10.1. The identity of the Whistleblower (in case revealed by the Whistleblower) shall be kept confidential and will not be revealed unless required in terms of an order of a court of law or as specified as under.
- 10.2. Complete protection will be given to the Whistleblower against retaliation or retribution consequent upon his/her having reported a Protected Disclosure. In the event the Whistleblower experiences any such incidents, the Whistleblower should immediately report the same by email to the Whistleblower committee at [whistleblower@axismf.com](mailto:whistleblower@axismf.com) or the Chairman of the Audit Committee at [chairman.auditcommittee@axismf.com](mailto:chairman.auditcommittee@axismf.com)
- 10.3. Any Whistleblower raising a concern under the Policy in good faith, believing it to be substantially true, is assured of the protection.
- 10.4. The Company will take steps to minimize difficulties that a Whistleblower may face in the submission of a Protected Disclosure. For instance, whistleblower will be reimbursed expenses incurred in travel, boarding and lodging for tendering evidence, if warranted, as per applicable internal policies.
- 10.5. In case any action has been initiated against the Whistleblower (for acts of omission or commission attributed to them) the disciplinary authority in such cases should comprise of Officers of grade not lower than President.



- 10.6.** Any person who assists in investigating a Protected Disclosure will also be protected to the same extent as the Whistleblower.
- 10.7.** In case the protection to the Whistleblower as well as employees assisting in the investigation (as outlined above) is violated in any manner, the same may be reported by email to the Whistleblower Committee [whistleblower@axismf.com](mailto:whistleblower@axismf.com) or the Chairman of the Audit Committee at [chairman.auditcommittee@axismf.com](mailto:chairman.auditcommittee@axismf.com).

The protections available under this Policy will not be extended to the following circumstances:

- i If the Whistleblower has raised a complaint/protected disclosure to a forum other than the Committee(s) and has revealed his/her identity.
- ii If the protection is sought from departmental actions arising out of false or bogus disclosure made with mala fide intention or complaints made to settle personal grievance;
- iii If the disclosures made by the Whistleblowers are subsequently found to be mala fide or frivolous or with a malicious intention. Such Whistleblowers shall be liable to be prosecuted and appropriate disciplinary action will be taken against them under the applicable Company's policies, when it is established that the Protected Disclosure has been made with intention of malice;
- iv If any adverse action has been taken against the Whistleblower which is independent of his/her disclosure under this Policy or alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this Policy.
- v The identity of the Whistleblower will not be protected and may be revealed in the following scenarios (i) as required in terms of any law or regulation or orders of any courts or tribunals; (ii) to the investigation officers and the team carrying out the investigation into the Protected Disclosure;(iii) to members of the Committee(s); (iv) to the officials assisting the Committee(s); (v) to the officials of the Compliance Department; (vi) as permitted/required by the Whistleblower; (vii) to the ' Subject' if the allegations are of a personal nature and the Subject is required to know the identity of the Whistleblower for co-operating in the investigation as per assessment of the applicable investigation department(s); (viii) if the identity has been disclosed in the public domain by the Whistleblower, or by any other person other than as a breach of this Policy.
- vi Any employee who is found to be involved in misuse or malicious use of the Policy, or making of false allegations or seeking personal advantage would not get protection under the policy and would face strict disciplinary action.
- vii A Whistleblower will not get protection under this Policy if the Whistleblower is also found guilty of any misconduct (with respect to the Protected Disclosure or otherwise). It is clarified that, while the Committee(s) will take cognizance of the Protected Disclosure, the Whistleblower's misconduct will be dealt with separately and is liable for disciplinary action, if such misconduct is proven.

## **11. Protected Disclosures received from Anonymous Whistleblower(s):**

The Company encourages Whistleblower(s) to disclose his/her identity while making the Protected Disclosure under the Policy. However, if the Whistleblower wishes to keep his/her identity anonymous, such complaint may be investigated by the Company only if the Whistleblower Committee is satisfied that such anonymous complaint contains specific and verifiable information along with evidence (to the extent available with the Whistleblower) to

establish a prima facie case for investigation. However, it is clarified that until the Whistleblower Committee is satisfied that such anonymous complaint contains specific and verifiable information, the Company is not bound to take any specific steps/actions or conduct investigation(s) in relation to such complaint. Neither the Company nor the Whistleblower Committee bears any liability or responsibility in this regard.

In case the information provided by the anonymous Whistleblower, in the opinion of the Company, is insufficient, Company will attempt to reach out to the anonymous Whistleblower (if possible) to obtain additional information to enable the conduct of an investigation.

Where such Protected Disclosures are not investigated due to a lack of specific and verifiable information, these shall, in any event, be kept on file and in the records. If at any subsequent stage the Whistleblower comes forward with identifying the Whistleblower or provides sufficient proof to the satisfaction of the Whistleblower Committee, the Company shall consider the same afresh.

With respect to anonymous Protected Disclosures, the Company (including the investigating departments and the Whistleblower/ Disciplinary departments) may request the Whistleblower to disclose his/her identity, if allegations in the Protected Disclosure are of a personal nature and the identity is required for the purposes of conducting the investigation into such allegations. For example, Company may request the Whistleblower to disclose his/her identity, including if the allegations related to the following:

- a) **PMS (Performance management system) rating of the Whistleblower.**
- b) **discrimination or victimization suffered by the Whistleblower on account of raising a Whistleblower complaint**
- c) **Unethical/illegal/wrongful transactions where the Whistleblower may also be involved / is a party to the transaction and such details are required for the investigation**

## **12. Composition of the Whistleblower committee**

The Whistleblower Committee will comprise of members from the pool of members approved by the Audit Committee of the Board. The composition, constitution, quorum, meetings, and other matters relating to the Whistleblower Committee shall be formulated by Head-HR in consultation with the MD & CEO and will be reviewed periodically.

Current Committee is as follows:

- Head- Compliance, Legal & Secretarial
- Head - HR

## **13. Role of the Whistleblower Committee**

- 13.1.** The Whistleblower Committee will consider the credibility of the Protected Disclosure, the gravity of the issue raised and the likelihood of proving the allegation(s) from independent, verifiable sources.
- 13.2.** The Whistleblower Committee would have the discretion to appoint any official(s) in the Company/ external expert/agency to carry out any investigation, as it may feel necessary and

require the Head-HR to oversee and monitor the external expert/agency, if deemed appropriate by the Whistleblower Committee.

- 13.3.** The Whistleblower Committee, may in its sole discretion, refer back an investigation report(s) (IVR) to the investigation unit for further re-examination if the Committee members are of the view that the findings with regard to the allegations made in the Protected Disclosure are not adequately addressed. Further, the Whistleblower Committee may also require a fresh investigation to be conducted or expand the scope of the existing investigation, if the Whistleblower Committee is of the view that such actions are warranted.
- 13.4.** Any member of the Whistleblower Committee who has a conflict of interest shall promptly disclose the same to the other members and recuse himself/herself from the matter. If any such conflict of interest is discovered (whether or not disclosed) the concerned member of the Whistleblower Committee shall be removed.

#### **14. Procedure for reporting Protected Disclosures**

- 14.1.** All Protected Disclosures reported against employees across all grades should be addressed to the Whistleblower Committee by post addressed to the Whistleblower Committee in the corporate office at:  
Axis AMC Ltd, 22<sup>nd</sup> – 23<sup>rd</sup> Floor, One Lodha Place, Lower Parel, Mumbai – 400025.  
By email to the Whistleblower Committee at [whistleblower@axismf.com](mailto:whistleblower@axismf.com)

All communications to the Whistleblower Committee should carry the caption "Protected Disclosure under the Whistleblower Policy" in the subject field.

- 14.2.** All Protected Disclosures reported against the member of the Whistleblower committee, Directors, Board members including the MD & CEO may be reported by sending email to Chairman of the Audit Committee of the Board at [chairman.auditcommittee@axismf.com](mailto:chairman.auditcommittee@axismf.com)
- 14.3.** Any member of the Audit Committee who has a conflict of interest, shall promptly disclose the same to the other members and recuse himself/herself from the matter. If any such conflict of interest is discovered (whether or not disclosed) the concerned member of the Audit Committee shall be removed.
- 14.4.** Protected disclosures should preferably be reported using electronic channels and if submitted in hard copy, should either be typed or written in legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistleblower.
- 14.5.** Without prejudice to Clause 14.4 above it is suggested that the Protected Disclosure be forwarded under a covering letter (or as an attachment to the email message) such that only the covering letter/email message bears the identity of the Whistleblower. The Whistleblower should, preferably, disclose the personal details only as part of the separate covering letter/email sent together with the Protected Disclosure and such personal details should not be a part of the Protected Disclosure itself.
- 14.6.** In case the Whistleblower has a personal interest in the matter, it should be disclosed at the outset in the forwarding letter/email message.
- 14.7.** The covering letter/email message should prominently indicate that the Protected Disclosure/complaint is being made under the "Whistleblower Policy".
- 14.8.** Copies of documents that may help in establishing the veracity of the Protected Disclosure report/complaint may be attached to the Protected Disclosure.



- 14.9. The envelope containing the Protected Disclosure/complaint (when made in paper form) should be marked “Confidential”.
- 14.10. The Designated Authority shall detach the covering letter/email message and forward only the Protected Disclosure to the investigators for investigation.
- 14.11. An acknowledgement of receipt of the Protected Disclosure/complaint will be sent to the Whistleblower only through the prescribed electronic channels and, in case of handwritten Protected Disclosures, if the complete address is provided within a reasonable time .

## 15. Investigation and redressal of the Protected Disclosure

- 15.1. The Protected Disclosure received under this policy will be examined to determine if prima facie a case exists for inquiry. The same would be forwarded for investigation to the concerned investigations department.
- 15.2. However, the decision to conduct an investigation is by itself not an acceptance of the allegations. In other words, the investigation process is to be treated as a neutral factfinding process.
- 15.3. Stringent disciplinary or other action may be initiated against Whistleblowers making/facilitating frivolous complaints/Protected Disclosures.
- 15.4. The Subject(s) shall have a duty to co-operate with the Committee or the investigation authority /any of the investigation officers during investigation.
- 15.5. Once the investigation is completed and an appropriate action has been taken by the Committee, the Whistleblower will be informed about the closure, as maybe authorized by the Committee.
- 15.6. If it is deemed necessary by the investigation authority, that it is necessary to verify the contents of the Protected Disclosure, the investigation authority (internal/ external) may contact the Whistle Blower at the address/ phone number/ e-mail ID given in the Protected Disclosure for the purpose of investigation (wherein the details have been revealed by the Whistleblower).
- 15.7. If the Whistleblower is dissatisfied with the disposal of the Protected Disclosure, the Whistleblower may approach the MD & CEO (if the matter has been handled by the Audit Committee) or the Chairman of the Audit Committee( if the matter has been handled by the Whistleblower Committee) for review.
- 15.8. However, the Committee/MD & CEO/ Chairman of the Audit Committee, as the case maybe, will not be liable to disclose to the Whistleblower the outcome of the investigation and action taken in this regard. Further, any requests by the Whistleblower on the status of the Protected Disclosure/outcome of the investigation/ action taken etc. will not be entertained.

## 16. Outcome of investigations into allegations under Whistleblower policy

If the investigation report reveals that a **fraudulent**, illegal, unethical, or inappropriate action(s), behaviour (s), or practice(s) has been committed, the Protected Disclosure along with the Investigation report shall be

- (a) referred for disciplinary procedure/ action against the erring Subject(s) in accordance with the Code of Conduct and Ethics Policy of the Company;
- (b) in respect of behavioural issues/ HR related matters(**included in complaints relating to fraud, illegal, unethical, or inappropriate actions**), the Designated Authority can direct corrective action by HR such as: counselling, transfer, role change, etc. against the erring Subject(s) as deemed fit by the Designated Authority basis the investigation report; or



(c) any other actions as the relevant committee deems fit basis the investigation report. It is clarified that any disciplinary or corrective action initiated against the Subject(s) as a result of the findings of an investigation pursuant to this Policy shall be as per the applicable disciplinary procedures of the Company enumerated in the Company's Code of Conduct and Ethics Policy and Company may take other actions against the Subject(s) as deemed fit, including actions under other polices of the Company.

## **17. Reporting to the Audit Committee of the board**

A quarterly report on the synopsis of Protected Disclosures made pursuant to this Policy shall be submitted to the Audit Committee for information. The HR department shall assist the Whistleblower Committee with administration of the policy and will monitor and will submit the quarterly reports to the Audit Committee.

## **18. Display and notification**

The Whistleblower Policy shall be communicated to all new joinees along with the joining kit and the existing employees shall be communicated via mail and/or on HRMS. Employees are encouraged to speak up when they witness any violation of 'Code of Conduct & Ethics'. The same is achieved by –

- 18.1.** Making all aware about the policy through frequent emails and other means
- 18.2.** Ensuring proper channels of reporting and appropriate actions thereafter, and
- 18.3.** Allaying fear of reprisals and assuring employees a sense of safety in the organization and recognizing employees (with their consent) for whistle blowing.

Communication about the policy with an intent of eliciting a sense of responsibility towards organisation will certainly aid in building a strong corporate governance and compliance culture in the organisation.

## **19. Retention of Documents**

- a) All Protected Disclosures, along with other documents relating thereto shall be retained by the Company for a minimum of Ten years or as maybe required under the Company's internal policies/ applicable laws and guidelines.
- b) The investigation report of each investigation duly approved/ reviewed by the Competent Authority / by the concerned Investigation Officers shall be retained for future requirement of either the company or the external authority.

## **20. Administration of the Whistleblower policy**

The Human Resources department will be responsible for the administration of this Policy. The Policy will be reviewed and revised on an annual basis at a minimum and submitted to the Audit Committee, Board and Trustee for approval.

### Revision History

This policy document will be reviewed by the Policy Owner on an annual basis from the last review date.

Version	Review Date	Policy Owner	Reviewed/ Proposed by	Change description
1	May 27, 2022	Meghna Gupta, Head-HR	Meghna Gupta, Head-HR	New Policy
2	September 30, 2022	Arpita Shirsat, AVP-HR	Himanshu Misra, Head-HR	No changes
3	January 17, 2023	Rashmi Musale, AVP-HR	Himanshu Misra, Head-HR	Making the policy gender-neutral
4	May 01, 2023	Rashmi Musale, AVP-HR	Himanshu Misra, Head-HR	Change in policy formatting & Introduction of tabular version control, Making the policy gender-neutral (he/she/they)
5	Oct 01, 2023	Arpita Shirsat, AVP-HR	Himanshu Misra, Head-HR	Change in Chief Ethics Officer from Head – Risk to Raju Madaswamy
6	Nov 23, 2023	Arpita Shirsat, AVP-HR	Himanshu Misra, Head-HR	Aligning with Bank Policy
7	Apr 01, 2024	Arpita Shirsat, AVP-HR	Himanshu Misra, Head-HR	Aligned with Bank's policy. Introduced SOP and Charters
8	Jul 22, 2024	Arpita Shirsat, AVP-HR	Himanshu Misra, Head-HR	Aligned with Bank's policy.
9	July 11, 2025	Anup Chandra, AVP-HR	Himanshu Misra, Head-HR	Aligned with Bank's policy.
10	Oct 01, 2025	Anup Chandra, AVP-HR	Himanshu Misra, Head-HR	No change

*Version control operationalised from September 2022 onwards*