

Whistle Blower Policy

Policy No: 20

Purpose:

The purpose of this Whistle Blower Policy is to establish a framework that encourages and facilitates the reporting of suspected misconduct, unethical behavior or illegal activities within the organization. The policy aims to protect the interests of the organization, its employees, stakeholders, and the general public.

The purpose of this policy is to articulate the Company's point of view on **whistle blowing**, the process, and the procedure to strengthen whistle blowing mechanism at the Company.

This policy:

- Provides a platform and mechanism for the employees to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- It provides an environment that promotes responsible and protected whistle blowing. It enables Employees about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Company's Code of Conduct.
- Above all, it is a dynamic source of information about what may be going wrong at various levels within the Company and which will help the Company in realigning the processes and take corrective actions as part of good governance practice.

Last updated – 07th July 2023

Scope:

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This policy applies to all employees, contractors, consultants, temporary staff, volunteers, and any other individuals associated with the organization. It covers concerns related to financial impropriety, legal violations, breaches of company policies, health and safety risks, environmental issues, harassment, discrimination, retaliation, or any other misconduct affecting the Company's operations.

Who is a whistle blower?

Any Employee who discloses or demonstrates evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct. This whistle blower is the person who has come to the decision to make a disclosure or express a genuine concern/grievance/allegation, after a prudent assessment.

Protection:

The Company assures that it shall not allow any whistle blower to be victimized for making any complaint. Any kind of victimization of the whistle blower brought to the notice of the officer concerned or Company's HR team, it will be treated as an act warranting disciplinary action.

The process is designed to offer protection to the whistle blower provided that the disclosure made/concern raised/allegations made ("complaint") by a whistle blower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Company's code of conduct and other governing policies.

As a Company, we condemn any kind of discrimination, harassment, victimization or any other unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the whistle blower's right to continue to perform his/her duties/functions in a free and fair manner.

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Reporting in good faith

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Every Whistle blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumor. This also means that no action should be taken against the whistle blower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with ulterior intent/motive, the Company could take appropriate disciplinary or legal action against the concerned whistle blower.

Confidentiality

The Company is committed to maintaining the confidentiality of whistle blowers and the information provided to the maximum extent possible, consistent with the need to conduct an effective investigation. However, confidentiality cannot be guaranteed in all circumstances, especially when legal or regulatory requirements mandate disclosure or during formal legal proceedings. The Company will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistle blower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only if required and with the prior approval of the whistle blower.

A whistle blower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

Procedure for raising a complaint

Employees are encouraged to report concerns through following channels but not limited to:

- Employees can directly report to Managing Director.

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- Employees can reach out to the HR Office.
- Employees can report to their respective Head of Department in case they are unable to reach out to the Managing Director's Office or the HR Office.
- In the absence of Head of Department, they can report to their immediate Supervisor, Manager or a designated Senior Executive within the Company.
- Email and Online Reporting: Employees may have the option to report/write to reachmd@studyin-uk.com

The following types of complaints will ordinarily not be considered and taken up:

- Complaints that are illegible, if handwritten.
- Complaints that are trivial or frivolous in nature .
- Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed.
- Issue raised, related to employment contract or personal grievance (such as increment, promotion, appraisals etc.) also any customer/product/services related grievances

Procedure and Commitment

Upon receipt of a whistle blower report, the Company will conduct an initial assessment to determine the nature and severity of the concern. If necessary, an Investigation Committee will be formed, comprising individuals with relevant expertise, to investigate the matter.

- **Timely Investigation:** The Company will promptly commence the investigation and take appropriate steps to gather relevant information and evidence. The investigation will be conducted impartially and fairly, with the utmost respect for the rights of all parties involved.

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- **Investigation Committee:** The investigation committee will consist of individuals with appropriate skills and expertise, including but not limited to HR professionals, legal counsel, internal auditors, and external consultants, as required. The team will operate independently and ensure the integrity and confidentiality of the investigation.
- **Communication:** The Company will provide regular updates to the whistle blower, within the constraints of confidentiality and privacy laws, to ensure transparency and keep the whistle blower informed about the progress of the investigation. However, it should be noted that specific details about the investigation or the disciplinary actions taken against other individuals may not be disclosed due to privacy concerns.

Reporting process

The Company will maintain appropriate documentation of all whistle blower reports, investigations, and actions. These reports will be made accessible to the MD's Office, Directors, HR Office, Audit Team, Investigation Committee or any other authorized person within the company as and when required.

Validity

This policy is valid until any further revisions and communications after specific approval from the Managing Director's Office

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