

Whistle Blower Policy

1. Objective

The Whistle Blower Policy ("Policy") is designed to encourage and facilitate employees, clients, and other stakeholders to report any suspected or actual unethical behavior, illegal activities, or violation of regulatory requirements within the organization, without fear of retaliation. The purpose of this policy is to promote transparency, integrity, and accountability within the organization by ensuring that concerns are raised and addressed promptly.

As a part of our commitment to implement best practices on Corporate Governance, the "Whistle Blower Policy" is created with a purpose to provide a secured framework, which a person can use to share their views along with factual details, observations and objections with regards to unacceptable work behavior, management practices, business practices, physiologically adverse work conditions, and other such activities of reasonably negative nature which may be seen to tarnish the image of the organization

2. Scope

This Policy covers disclosures of any unethical behavior, improper conduct and malpractices and events that have taken place or are suspected to take place including:

- a) Malpractices and events which have taken place / suspected to have taken place;
- b) bribe;
- c) wastage or misappropriation of company funds or assets;
- d) Misuse or abuse of authority;
- e) Negligence causing danger to public health and safety;
- f) Violation of terms and conditions of employment and rules thereof;
- g) Tampering with the data and records of the Company;
- h) Misuse or causing damage to the properties or assets of the Company or misappropriation of the funds of the Company;
- i) Breach of business integrity and ethics;
- j) Causing financial irregularities, including fraud;
- k) Violation of laws;
- l) Pilferation of confidential or propriety information.
- m) Any other work committed with ill-intent towards the people employed in the Organization.

3. Formation of Whistle Blower Committee

A Whistle Blower Committee shall be formed, comprising at least two senior members of the organization. The committee will be responsible for the overall functioning of the whistleblower mechanism, ensuring that all concerns are appropriately reviewed and investigated. The panel shall comprise of members of specific functional areas as mentioned below:

1. Satish Chandra Gupta , Director
2. Shauryam Gupta, Director
3. Rashmi Chandra Gupta, Director

4. Appointment of Whistle Blower Redressal Head

The organization appoints Satish Chandra Gupta, Director as a Whistle Blower Redressal Head who will be responsible for reviewing complaints raised under this policy. The Redressal Head shall work under the guidance and instructions of the Whistle Blower Committee to ensure that concerns are addressed effectively and in a timely manner.

5. Dedicated Email for Reporting Concerns

A dedicated email ID ceo@rupeemy.in is hereby designated to allow whistleblowers to confidentially report concerns or complaints. This email ID will be monitored by the Whistle Blower Redressal Head and the Committee to ensure prompt attention to all concerns raised.

6. Process

All **Protected Disclosures** (*any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity*) should be reported in writing by the Whistleblower as soon as possible after the Whistle Blower becomes aware of the same, to the Whistle Blower Redressal Head so as to ensure a clear understanding of the issues raised and should be either typed or written in legible handwriting in English.

The Protected Disclosure should be forwarded to Whistleblower Redressal Head either by an e- mail or in a closed and secured envelope marked "Private and confidential". The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the Whistleblower. The information shall only move forward by to the whistle Blower Committee or the investigators for investigation purposes.

Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.

All Protected Disclosures reported under this Policy will be recorded and thoroughly investigated by the Investigating Committee. The Whistleblower Redressal Head under the authorization of Whistleblower Committee will investigate or oversee the investigation, as may be required. The Chairman of the Whistleblower Committee or the Chairman of the Company, as the case may be, will decide the process of investigation as deemed appropriate where Protected Disclosures are received by them.

7. Protection of Whistleblowers

The policy shall include mechanisms to ensure the protection of whistleblowers. This includes, but is not limited to, the following:

- Ensuring that the identity of the whistleblower is kept confidential to the extent possible.
- Ensuring that whistleblowers are treated fairly and that there is no retaliation against them for raising concerns in good faith.

In order to protect the identity of the Whistleblower, the Whistleblower Redressal Head will not issue any acknowledgment to the Whistleblower and the Whistleblowers are advised not to write their name/address on the envelope or enter into any further correspondence with the Whistleblower Redressal Head or the Whistle Blower Committee, as the case may be. The Whistleblower Redressal Head or the Chairman of Whistleblower Committee will ensure that in case any further clarification is required, he/she will get in touch with the Whistleblower.

8. Addressing Complaints Involving Key Personnel

- Complaints against the Board of Directors, including the Managing Director, Chief Executive Officer, key managerial personnel, Designated Directors, or Promoters, shall be addressed to the Whistle Blower Committee or another analogous body of the Trading Members.
- Complaints against other employees shall be addressed to the Compliance Officer, and such complaints will be handled as part of this Whistle Blower policy.

9. CONFIDENTIALITY

The Whistleblower, Investigating Committee, Whistleblower Redressal Head, Chairman of the Whistleblower Committee, Members of Whistleblower Committee, Chairman of the Company, Subjects, any of the Investigators and everybody involved in the process shall at all times:

- a) maintain confidentiality of all matters under this Policy;
- b) discuss the matter only to the extent or with those persons as required under this Policy for completing the process of Investigations;
- c) Ensure that all electronic mails/ files are password protected;

- d) Not keep any documents pertaining to the investigation unattended anywhere at any time; and
- e) keep the papers in safe custody.

If anyone is found to be non-compliant with the above, he/ she shall be held liable for such disciplinary action as is considered fit by the Whistleblower Committee.

10. Offences & Penalties

Where the Whistleblower Committee, at the time of examining the information submitted by the officials concerned, is of the opinion that the officials concerned, without any reasonable cause, has not furnished the information within the specified time or intentionally (mala fide) refused to submit the information or knowingly given incomplete, incorrect or misleading or false information or destroyed record or information which was the subject of the disclosure or obstructed in any manner in furnishing the information, it shall impose such penalty as it may deem fit depending upon the nature or fraud or unethical act done by that person.

Provided that no penalty shall be imposed against any person unless he has been given an opportunity of being heard.

11. Decision

If an investigation leads the Investigating Committee, Whistleblower Redressal Head, Chairman of the Whistleblower Committee or Chairman of the Company to conclude that an improper or unethical act has been committed they shall recommend to the management of the Company to take such disciplinary or corrective action as deems fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures

If the report of investigation is not to the satisfaction of the Whistleblower, the Whistleblower has the right to report the event to the appropriate legal or investigating agency.

12. Conclusion

The organization is committed to upholding the highest standards of ethics, integrity, and compliance. This policy ensures that individuals can report concerns about potential violations of laws, regulations, or internal policies without fear of retaliation. The Whistle Blower Committee, along with the Whistle Blower Redressal Head, will ensure that all concerns are promptly investigated and appropriately addressed.

13. Policy Enforcement and Review

The effectiveness of this Policy will be monitored and reviewed regularly. Any updates or changes to the policy shall be communicated to employees and stakeholders.

14. Approval and Annual Review

This policy shall be approved by the apex body of the organization, i.e., the Board. An annual review of the policy will be conducted to ensure its continued relevance, effectiveness, and alignment with regulatory requirements.

This Whistle Blower Policy is hereby approved and adopted by Astha Credit and Securities Private Limited on 15.01.2025.

Approved By: Satish Chandra Gupta
Director

Revision History:

Version:	Release Date	Reason for Change	Change Description
1	15-01-2025	NEW	NEW RELEASE