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# Whistleblower Policy

EMPOWERING INTEGRITY: A SAFE HAVEN FOR REPORTING CONCERNS



**PATTAMBI INVESTMENTS  
& LOANS (P) LTD**

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# Whistleblower Policy

*Pattambi Investments and Loans Pvt Ltd*

## 1. Introduction

The Whistleblower Policy aims to encourage employees and stakeholders to report unethical behavior, misconduct, or violations of company policies, laws, and regulations without fear of retaliation. This policy is in line with the guidelines established by the Reserve Bank of India (RBI) for Non-Banking Financial Companies (NBFCs) and aims to promote transparency and accountability within Pattambi Investments and Loans Pvt Ltd.

## 2. Purpose

The purpose of this policy is to provide a secure and confidential mechanism for whistleblowers to report suspected wrongdoing while ensuring that they are protected from retaliation. This policy fosters a culture of integrity and ethical behavior within the organization.

## 3. Scope

This policy applies to all employees, management, directors, contractors, vendors, and any other stakeholders associated with Pattambi Investments and Loans Pvt Ltd.

## 4. Definition of Whistleblower

A whistleblower is an individual who reports, in good faith, any suspected wrongdoing, misconduct, or violation of laws or company policies that may adversely affect the company, its employees, or stakeholders.

## 5. Types of Reportable Conduct

Whistleblowers are encouraged to report, but are not limited to, the following types of conduct:

- Fraud or financial irregularities
- Misappropriation of company assets
- Breaches of company policies or procedures
- Violations of laws and regulations, including but not limited to anti-money laundering (AML) laws
- Corruption, bribery, or any unethical practices
- Harassment or discrimination
- Any other conduct that may harm the company's reputation or operational integrity

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## 6. Reporting Mechanism

Whistleblowers can report concerns through the following channels:

- *Dedicated Whistleblower Email*: whistleblower@pil.org.in – All reports can be sent confidentially via this email address.
- *Anonymous Reporting*: Whistleblowers may choose to report their concerns anonymously if they prefer. Anonymous reports will be taken seriously and investigated, although it may be challenging to provide feedback without the whistleblower's identity.

## 7. Investigation Process

- *Acknowledgment*: Upon receiving a report, the designated Compliance Officer will acknowledge the receipt of the complaint within [specified timeframe, e.g., 5 working days].
- *Preliminary Review*: The Compliance Officer will conduct a preliminary review to assess the credibility of the allegations and determine whether a formal investigation is warranted.
- *Formal Investigation*: If warranted, a formal investigation will be initiated, which may involve interviewing relevant parties and gathering evidence. Investigations will be conducted discreetly and fairly.
- *Findings and Resolution*: Upon completion of the investigation, findings will be documented and reported to the management. Appropriate actions will be taken based on the investigation's outcome.

## 8. Confidentiality

All reports and investigations will be treated with the utmost confidentiality. The identity of the whistleblower will be protected to the extent possible, and information related to the investigation will be disclosed only to those involved in the process.

## 9. Protection Against Retaliation

Pattambi Investments and Loans Pvt Ltd prohibits any form of retaliation against whistleblowers who report concerns in good faith. This includes:

- Disciplinary action against the whistleblower
- Harassment or intimidation
- Any adverse employment actions, including demotion or termination

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## 10. Responsibilities of Whistleblowers

- Whistleblowers are encouraged to provide as much detail as possible about the suspected wrongdoing, including the nature of the misconduct, the individuals involved, and any relevant dates or documents.
- Whistleblowers must ensure that their reports are made in good faith and not based on malicious intent or false information.

## 11. Training and Awareness

Pattambi Investments and Loans Pvt Ltd will conduct regular training and awareness programs to inform employees and stakeholders about this policy, the reporting process, and the importance of ethical conduct.

## 12. Review and Amendments

This Whistleblower Policy will be reviewed periodically and may be amended to comply with changes in regulations, business practices, and organizational values. Employees will be notified of any significant changes.