

concern through this procedure. If considered appropriate or necessary, suitable legal actions may also be taken against such individuals.

However, no action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.

Any other Employee/business associate assisting in the said investigation shall also be protected to the same extent as the Whistleblower. However, a disciplinary action against the Whistle Blower which occurs on account of poor job performance or misconduct by the Whistle Blower and which is independent of any disclosure made by the Whistleblower shall not be protected under this policy.

Procedure

Investigation

- All the disclosures will be investigated by ombudsperson along with WIC
- In case investigation process leads to another investigation which has not been reported by the whistleblower, the ombudsperson may expand the scope and timeline to take final decision. Ombudsperson based on his/her discretion may take decision based on interim report in cases leading to more investigation and take the final decision after final report is submitted.
- If allegations are against a team member of any of the WIC member(s) or in case of conflict of interest in a given case, the member(s) should recuse themselves and the others on the committee would deal with the matter on hand.

Decision

If the investigation leads the WIC to conclude that an improper or unethical act has been committed, it will propose its recommendations after consultation with Group CEO. The Ombudsperson then will recommend the disciplinary or corrective action to be taken against the subject.

Reporting

- RBL Audit Committee will be kept informed about all whistleblowing disclosures & progress in terms of investigation and outcome
- Any investigation beyond 90 days of initial whistleblowing disclosure will be separately presented to RBL Audit Committee with reasons.

Definitions

- **“Whistle Blowing Committee” (WIC)** means an officer or Committee of persons who is/are nominated/ appointed to conduct detailed investigation of the disclosure received from the whistleblower and recommend disciplinary action. Currently, the following members are part of the committee.

Name	Contact Details
1. Mr. Gurpreet Singh Sidana	gurpreet.sidana@religare.com +91 120 4866590
2. Mr. Vikas Sethi	vikas.sethi@religare.com +91 120 4866650
3. Ms. Hina Dhamija	hina.dhamija@religare.com +91 120 4866582

The committee may co-opt other members as per the discretion of Ombudsperson.

Document Retention

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

Amendment

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. RBL Audit Committee will review and may amend this policy from time to time.

Effective Date of the Policy

This Policy will come into effect from the date of approval of the same by the Board of Directors of Company.