

# **WHISTLE BLOWER POLICY**



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## Section 1: Purpose

The Purpose of Whistleblower Policy (“Policy”) is to outline the mechanism through which any Stakeholder / Whistleblower can raise the complaint or blow the whistle, regarding any non-compliant activity within AEON Credit Service India Pvt. Ltd. (“Company”) which is in deviation of the AFS Group Compliance Policy. The objective behind this Policy is to maintain good governance within the Company and to encourage bonafide disclosures.

## Section 2: Definition

- a) **Stakeholder:** Stakeholder includes any staff / employee as defined under Working Policy of the Company or any ex-staff / ex-employee or any third party associated with the Company.
- b) **Whistleblower:** Whistleblower means any person including Stakeholder, reporting the matter/complaint under this Policy.

## Section 3: Decision Making Authority

The Managing Director of the Company:

- a) shall determine whether the matter/complaint reported under this Policy, warrants any action and accordingly may forward the matter/complaint to the Disciplinary Action Committee (DAC) for necessary action or direct the concerned Head of Department to take necessary corrective steps; and/or
- b) shall include / appoint any person/s for investigation of the matter/complaint received under this policy, if deemed necessary.

However, the Managing Director of the Company may discuss the matter or complaint with other Executive Directors, if required, before deciding the actionable or calling for DAC meeting.

## Section 4: Channel for Complaint

- a) All Stakeholders are encouraged to identify and report the instances which are against the interests of the Company including improper and unethical behaviour.
- b) Complaint can be lodged / reported anonymously or if the Whistle blower chooses to identify himself/herself, the identity of such person shall be protected.
- c) The complaint/information may be reported through the channels as detailed below:

### 1) **ACS India Compliance Hotline:**

i. AEON Credit Service India (Pvt.) Ltd.

**By Post:** The Managing Director,  
AEON Credit Service India Pvt. Ltd.,  
TF-A-01, Art Guild House, Phoenix Marketcity,  
LBS Marg, Kurla (West), Mumbai - 400070.

**By Telephone:** 022-62664889

**By E-Mail:** [wb@aeoncredit.co.in](mailto:wb@aeoncredit.co.in)



**ii. Complaint against Directors:**

If there is any complaint to be filed against any of the Directors, then the Complainant can file his/her complaint directly to the Managing Director of the Company on his official email ID - [keiichi\\_nambu@aeoncredit.co.in](mailto:keiichi_nambu@aeoncredit.co.in).

However, if the complainant wants to escalate or file the complaint to AFS, he /she can refer the AEON Compliance Hotline.

**2) AEON Compliance Hotline:**

**a) AEON Financial Service Japan**

**By Post:** AEON Financial Service Japan,  
12F, Terrace Square, 3-22,  
Kandanishiki-cho, Chiyoda-ku,  
Tokyo, 101-0054, Japan.

**b) Website: <https://aeon-ethics.my.salesforce-sites.com/>**

Login: ACSI002

Password: 9999

**3) Legal Attorney Hotline**

**By E-mail:** [report\\_aeonglobal@yglpc.com](mailto:report_aeonglobal@yglpc.com)

Include the following when sending an email.

- (1) Reporting person: company name and contact information  
(Department name and reporting person's name, if possible)
- (2) Person being reported, company name, department, and title.
- (3) Details of the breach or misconduct (be specific and based on the facts)

The (Overseas) Legal Attorney Hotline is commissioned by AEON Group, which can be used for reporting of any misconduct, including violation of laws or internal policies by the management of the Company i.e., above Asst. Vice President (Senior General Manager as defined in AFS Policy).

## **Section 5: Protection to disclosure of the Whistleblower**

In order to ensure protection to the Whistleblower, the Company will be taking following measures:

- a) Maintain confidentiality of the name of Whistleblower and the subject matter reported through Whistleblower channel.
- b) Protect Whistleblower from any fear of biasness, power harassment, or any action linked to the subject matter in future, due to reported incident/facts.
- c) Any other harassment from the interested parties directly or indirectly, will be protected by the Company.



## Section 6: Coverage of Policy/Nature of Complaints

Any small/petty matters in connection with any department, which may be discussed or resolved within the department level are advised not to be reported through Whistleblower channel.

The Policy covers malpractices and events that may take place in the Company, which includes the following:

- a) Abuse of authority.
- b) Breach of Code of Conduct or Ethics, Policy, or employment contract.
- c) Manipulation of Company data/records.
- d) Financial or compliance irregularities, including fraud, or suspected fraud.
- e) Criminal offence having repercussions on the Company or its reputation.
- f) Unauthorized use/distribution of confidential/proprietary information.
- g) Deliberate violation of law/regulation.
- h) Misappropriation or misuse of Company funds/assets.
- i) Breach of employee's Code of Conduct or Rules.
- j) Any other illegal, unethical, imprudent deed / behavior or actual or suspected fraud.

Whistleblower Policy should not be used as a route for raising malicious or unfounded allegations against colleagues.

If any stakeholder, encounters any of the above instances/events, they can report it through the Whistleblower mechanism.

The above list is illustrative and not exhaustive. Any other matter/complaint against the interests of the Company, reported through Whistleblower channel may also be dealt, in accordance with the Whistleblower Policy.

## Section 7: Department In-Charge

The Department in charge for handling this policy shall be Legal Department.

## Section 8: Revision and Abolishment

Revision and abolishment of this Policy shall be planned and conducted by the Legal Department. Revision and abolishment of this Policy requires appropriate approval of the Executive Committee.

The Legal Department shall review this Policy annually or as and when required, pursuant to the changes in law / business environment or strategy requirements or developments of Policy of Policy Control.