



Whistleblower Policy

Document No.

A-LC-006-02

Policy

Regulation

Procedure

Title: Whistleblower Policy

AMENDMENT/ABOLITION RECORD

Version	Establishment or Amendment	Effective Date	Description of Change
00	2 nd January, 2015	16 th January, 2015	Initial Version
01	2 nd January, 2017	2 nd January, 2017	Amended as per audit findings
02	26 th April, 2018	01 st May 2018	Policy re-designed and handed to Legal & Compliance

Note: The amendment or abolition of the document shall be done in accordance with Policy Control Policy.

Mumbai, 26th April, 2018

Approved by Executive Committee Meeting


Daisuke Maeda

Managing Director

Remarks:

方針	Policy	The fundamental principles/ rules/ philosophy of which the Company shall base on with respect to the business administration and the process of making organizational decisions. 業務執行や組織上の意思決定に際し準拠すべき基本的な原則・規則・原理
規程	Regulation	The complementary details based on Policy. 方針に準拠した補完的詳細事項
細則	Procedure Flow	Operational procedures/ flows/ methods based on Policies and Regulations to manage administrative matters. 方針・規程に基づいた業務の具体的処理のための作業手続きや方法



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Section 1: Purpose

- a) To define improper /unethical behavior
- b) To define the scope and constitution of whistleblower committee for the purpose of act finding
- c) To outline the investigative mechanism for such reported instances
- d) To propose a review mechanism for the investigated instances
- e) To outline measures to protect disclosing employees against discrimination / inadvertent consequences within the company

Section 2: Definition

- a) **Chairperson:** The chairperson will be any of the Executive Director as unanimously elected by the members present in the meeting.
- b) **Employee:** All employees of the company including ex-employee for the purpose of this policy.
- c) **Whistleblower Committee:** As defined under section 3 of this policy
- d) **Investigator:** means those persons authorized, appointed or approached by the whistle Blower committee for investigation.
- e) **Whistleblower:** means an employee / any third party associated with the Company making disclosure under this policy
- f) **Improper/Unethical behavior:** It includes suspected or alleged illegal, false, misleading, dishonest, unethical, non-compliant, corrupt or unconscionable conduct. As per Coverage of this policy and also includes other acts pertaining to breach of policy/misappropriation/harassment etc. which could be part of code of conduct policies. This definition is illustrative and not exhaustive.

Section 3: Constitution & Scope of Whistleblower Committee

- a) The Committee shall consist of the members as mentioned in Appendix 1. The decision of nomination and appointment of committee member shall be at the discretion of the top management consisting of Managing Director and other Executive Directors, and on its discretion may change the structure of the committee as it may deem fit at any given point of time.
- b) The minimum quorum for the meetings of Whistleblower Committee shall be any four members including the Chairperson, whose presence is must. In absence of the Chairperson, the committee shall unanimously elect one of them as the Chairperson of the committee. Based on decision of majority of the members, the matter/complaint under Whistleblower will be reviewed & based on the merits of the case/matter, the same will be referred to the



Disciplinary Action Committee for further investigation or decision.

- c) The preliminary investigation shall ordinarily be completed within the period of 15 days from the receipt of the complaint before referring the case to the Disciplinary Action Committee. In the event, the investigation is not finished within the stipulated time, the reason for such delay shall be recorded in the report submitted to the Managing Director.

Section 4: Channel for complaint

- a) The opportunity provided under this policy is for disclosing wrongful/unethical acts, which are considered to be in deviation of the above mentioned policy defined either by negligence or intentional disregard and should not be used as a defense or mechanism to mislead the company.
- b) The perspective behind such a policy being good governance, the company encourages bonafide disclosures but any false allegation/ complaint to the committee shall be subject to disciplinary action.
- c) The complaint/information may be reported in writing or through internal hotline telephone number verbally (022-33606889).
- d) All employees are opened to log any complaint. Identity of the person who has put the complaint shall be protected.
- e) The following are the varied channels through which a Complaint may be lodged by a Whistleblower:
- 1) AEON Credit Service India (Pvt.) Ltd.
By post:
AEON Credit Service India Pvt. Ltd.,
Chairman, Whistleblower Committee,
TF-A-01, Art Guild House,
Phoenix Marketcity,
LBS Marg, Kurla (West),
Mumbai-400070.
Telephone:
022-33606889
By E-mail:
wb@aeoncredit.co.in
 - 2) AEON Financial Service Japan
By post:
12F, Terrace Square, 3-22,
Kandanishiki-cho, Chiyoda-ku,

1



Tokyo, 101-0054, Japan.

By E-mail:

afs110@aeonfinancial.co.jp

3) AEON Group

<https://aeon-ethics.secure.force.com>

Login: ACSI002

Password: 9999

Section 5: Protection to Disclosure of the Whistle blower

In order to have protection to the whistle blower the company will be taking following measure:

- A. Maintain confidentiality of the name of whistle blower and the subject matter reported through whistle blower channel.
- B. Protect complainant 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 company.

Section 6: Procedure for investigation & reporting

1. On having received the incidence by the committee, the decision to conduct the investigation is based on preliminary fact finding and analysis to determine whether or not the same is qualified for further investigation.

Further, if it qualifies for the investigation, the Committee may refer it to the Disciplinary Action Committee for doing all such act as it may deemed fit at its sole discretion.

2. The proceedings of the Committee meeting shall be recorded in minutes immediately after holding of meeting and kept in record after duly signed by the Chairman of the Committee.

Section 7: Coverage of Policy/Nature of Complaints

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

The Policy covers malpractices and events which have taken place 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. Pilferation of confidential/proprietary information
- G. Deliberate violation of law/regulation
- H. Misappropriation or misuse of Company funds/assets
- I. Breach of employee Code of Conduct or Rules
- J. Any other illegal, unethical, imprudent deed / behaviour or actual or suspected fraud
Policy should not be used as a route for raising malicious or unfounded allegations against colleagues.
- K. Any employees or third party associated with the Company comes to access any of the above instances/events can report it through the whistle blower mechanism.

The above list is illustrative and not exhaustive.

Section 8: Section in Charge

The section in charge for handling this policy shall be HR & Welfare Section.

Section 9: Revision and abolishment

This policy may be reviewed by the Legal & Compliance Section keeping in view of legal & regulatory changes or for any other reason as and when required. Revision and abolition of this policy requires approval of the Executive Committee.



Whistle Blower Committee - Appendix 1

Title	Designation
Chairperson	Director Incharge – HR & Admin
Member	Director Incharge- Operations
Member	Director Incharge – Legal & Compliance
Member	Head, Human Resource & Administration Department
Member	Manager- HR & Welfare Section
Member	Manager-Legal & Compliance Section

Any superior / reporting authority of suspicious / non-compliant employee and others required as decided by the Chairperson from case to case basis.

Change in committee member to be approved by the Managing Director



Report on Whistle Blower Committee - Appendix 2

To: Mr.

Managing Director

CC: Mr. (Chairperson of the Committee)

Date:

Disciplinary Committee

[Report on Disciplinary Committee of Mr.]

Dear MD,

We would like to hereby report the Disciplinary Case of Mr.

❖ BACKGROUND

❖ FACTS BY INVESTIGATION

❖ DISCIPLINARY COMMITTEE

❖ CONCLUSION

(To be submitted to DAC or not)

❖ SCHEDULE

(Record reason for delay (if any))

Request you to kindly accept our request.

Best Regards,

Chairman:

Name:

Signature:

Member:

Name:

Signature:

Member:

Name:

Signature:

Managing Director:

Approve / Reject

Name:

Signature:

Date:



Member:

Name:

Signature:

Member:

Name:

Signature:

Member:

Name:

Signature:

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