

Policy No: VFPL/HR/ORG/004

Whistle Blower Policy

Version	Dated	Prepared	Reviewed	Approved	Remarks
1.1	01-Jan-2021	Chandra Kumar CS	Brajesh Mishra	Steve Hardgrave	
1.2	26-Nov-2024	Nandhini H	Bindu S N	Chandra Kumar CS	The Chairman of the Audit Committee was changed from Sunil to Brahmanand Hegde

1. Objective of the policy

To maintain high ethical standards, Varthana encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of unfair treatment or punishment.

Employees can raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc. The following malpractices or events which have taken place or suspected to have taken place can be reported:

- 1.1. Abuse of authority
- 1.2. Breach of contract
- 1.3. Negligence causing substantial and specific danger to public health and safety
- 1.4. Manipulation of company data/records
- 1.5. Financial irregularities, including fraud/suspected fraud or deficiencies in internal control and check. Deliberate error in preparations of financial statements or misrepresentation of financial reports.
- 1.6. Any unlawful act whether criminal/civil
- 1.7. Disclosure of confidential/proprietary information
- 1.8. Deliberate violation of the law/regulations
- 1.9. Wastage/misappropriation of company funds/assets
- 1.10. Breach of company policy or failure to implement or comply with any approved company policy

2. Process

If an employee, customer or a partner of Varthana wants to highlight a serious concern that could have a grave impact on the operations and performance of the business of Varthana, the following process can be followed:

- 2.1.1. The whistleblower needs to make a disclosure in writing via email or letter (emailed, couriered, or hand delivered) to the Whistle Officer or the Chairman of the Audit Committee
- 2.1.2. The contact details of the Chairman of the Audit Committee and Whistle Officer are:

NAME AND DESIGNATION	CONTACT DETAILS
Brahmanand Hegde Chairman Of Audit Committee	hegde.brahma@gmail.com
Steve Hardgrave (Vice Chairman) Whistle Officer	steve@varthana.com +91 9886024510

- 2.1.3. Whistleblowers are required to put their name and contact details as follow-up questions; investigations may not be possible without this information. Anonymous disclosures may not be investigated.
- 2.1.4. The organization will take the responsibility to protect the whistleblower and keep the entire disclosure confidential during the course of the investigation.
- 2.1.5. The investigation will be conducted in a fair and unbiased manner. The investigation will be based on fact finding and kept completely confidential.
- 2.1.6. The recommendation and the investigation report will be submitted to the relevant authorities and further disciplinary action will be taken.
- 2.1.7. The Whistle officer will be the primary point of contact for the whistleblower to get updates and information on the progress of the investigation.

3. General Guidelines

An employee who knowingly makes false allegations of unethical and improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment, in accordance with Varthana's rules, policies and procedures.

Disclaimer: Varthana reserves its right to amend or modify this Policy, at any time without assigning any reason whatsoever. This policy is an internal document and is confidential shall be used only for internal purposes for authorized use only, no one shall copy or republish this.

Please write to askhr@varthana.com for any further information.