

Whistle Blower Policy

1. Introduction

Alice Blue Financial Services Private Limited ("Alice Blue" or "the Company") is committed to maintaining the highest standards of integrity, transparency, and accountability in all its business dealings. In line with these principles, this Whistle Blower Policy ("the Policy") has been formulated to provide a secure and confidential mechanism for employees, directors, stakeholders, and other parties to report genuine concerns regarding unethical behavior, misconduct, fraud, or violations of the Company's Code of Conduct.

2. Objective

The primary objectives of this Policy are to:

- Encourage stakeholders to report unethical practices without fear of retaliation.
- Provide a clear framework for investigation and resolution of complaints.
- Protect Whistle Blowers from victimization or harassment.
- Ensure compliance with applicable laws and regulations.

3. Applicability

This Policy is applicable to all:

- Directors,
- Employees (permanent, temporary, contractual, trainees, and interns),
- Business associates, consultants, vendors, and
- Any other stakeholders of Alice Blue.

4. Scope of the Policy

The Policy covers reporting of genuine concerns such as:

- Misconduct, malpractice, or unethical business practices.
- Actual or suspected fraud, bribery, or corruption.
- Breach of the Company's Code of Conduct or policies.
- Violation of legal or regulatory requirements.
- Misuse of Company's assets or confidential information.
- Any act that adversely affects the Company's reputation or financial position.

5. Reporting of a Whistle Blower Concern/Complaint

a. Whistle Blowers may raise concerns through any of the following channels, which shall be considered valid under this Policy:

- Email – Send an email to:
 - Level 1**
 - Whistle Blower Committee: whistleblower@aliceblueindia.com
 - Level 2**
 - Chairperson of the Audit Committee: chairperson.auditcom@aliceblueindia.com
- Written Communication – Submit a sealed letter addressed to the Compliance Officer at the Corporate Office. The envelope should be marked as “Confidential”.
- Case Management System – Employees may record concerns directly in the Whistle Blower Case Management System, where available.
- In exceptional or sensitive situations, additional communication modes may be provided to ensure accessibility.

b. Depending on the official against whom the concern is raised, the Whistle Blower may address the complaint to the appropriate authority, as outlined in the table below:

Concern Raised Against	To Be Addressed To
Any Employee	Compliance Officer / Whistle Blower Committee
Director / Senior Management	Audit Committee Members directly

6. Investigation Process

- All complaints will be acknowledged and reviewed by the Whistle Blower Committee.
- A fair, unbiased, and confidential investigation will be conducted.
- The findings will be documented, and appropriate corrective or disciplinary action will be taken, if required.
- The outcome of the investigation will be communicated to the Whistle Blower, where possible and appropriate.

7. Protection to Whistle Blower

- Alice Blue assures that no Whistle Blower who reports a genuine concern in good faith will suffer any form of retaliation, discrimination, or harassment.
- Malicious or frivolous complaints, however, may attract disciplinary action.

8. Confidentiality

All concerns raised will be treated with strict confidentiality. The identity of the Whistle Blower will not be disclosed without their explicit consent, except where required by law.

9. Roles and Responsibilities

- The Whistle Blower Officer/Committee shall oversee the implementation and monitoring of this Policy.
- Employees and stakeholders are encouraged to report genuine concerns promptly and responsibly.
- Senior Management and the Board shall ensure that appropriate resources and independence are provided for effective implementation of the Policy.

10. Audit Committee

The Audit Committee is responsible for overseeing the Whistle Blower mechanism and ensuring proper investigation of complaints. The current composition of the Committee is as follows:

- Mr. Sidhavelayutham – Director, Chairperson of the Committee
- Mr. Rajesh K. – Director, Member
- Mr. Saravanan T. – Chief Financial Officer (CFO), Member
- Mr. Saravanan R. – Compliance Officer, Member

11. Amendment

Alice Blue reserves the right to amend or modify this Policy in whole or in part at any time to comply with legal requirements or to align with best practices. All amendments will be approved by the Board of Directors.

12. Approval

This Whistle Blower Policy has been approved by the Board of Directors of Alice Blue Financial Services Private Limited and is effective from the date of such approval.