

# Whistle Blower Policy

Bajaj Finserv Asset Management Limited

<b>Title:</b>	Whistle Blower Policy		
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<b>Reviewed By:</b>	Vaibhav Date	<b>Original Version Date:</b>	Dec 26, 2023
<b>Approved By:</b>	Ganesh Mohan	<b>Last Revision Date:</b>	Oct 21, 2024

## Document Control Log

Version	Prepared By	Reviewed By	Approved By	Effective Date	Key Updates
Version 1.0	Aishwarya Deshpande	Vaibhav Date	Ganesh Mohan	Dec 26, 2023	Launch
Version 2.0	Rahul Mehrotra	Vaibhav Date	Ganesh Mohan	Aug 1, 2024	Updated conflict of interest of Enforcement Committee members & CEO Updated Protection of Whistle Blower / Complainant Added issues not covered under the policy Added contact details of Enforcement Committee members

### Document Control

#### Version History:

Date	Version	Description of Change	Owner	Approved by
Apr- 2024	1.0	New Document	BFSAML	Board of Directors of AMC and Trustee
Oct-2024	2.0	Updating the policy in line with SEBI Circular on Risk Management Framework for Mutual Funds.	BFSAML	Board of Directors of AMC and Trustee
Apr-2025	2.0	Annual Review	BFSAML	Board of Directors of AMC and Trustee

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#### AMENDMENTS to the STANDARD, if any:

- Shall be made, only by the policy owner as approved by the Management.
- Shall be incorporated in all the controlled copies and entered in the Document Control Log enclosed in the template

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“This Policy is indicative and supersedes any previous policies published with respect to the subject matter(s). The Policies and benefit descriptions are not terms of employment or a contract guaranteeing any benefits. The Company reserves the unlimited right to amend, cancel, withdraw and /or replace the policy mentioned herein with a new policy at its sole discretion without any prior notice or communication and/or assigning any reason. The decision of the Company with regard to the policies shall be final and binding on all employees. This Policy Handbook is confidential and only for the internal reference of the employees and should not be shared or circulated any further.”

## 1. Purpose:

Many a violation does not affect an individual directly but is detrimental to the organization's interest. Individuals hesitate to report such violations out of fear or indifference. The Whistle Blower's policy provides a mechanism for an individual to report violations without fear of victimization.

When the director/employee sees violations of integrity norms, he/she may not be directly aggrieved, but may have information that organizational interests are being compromised. This may be unethical behavior, suspected or actual fraud, violation of the Code of Conduct etc.

Bajaj Finserv Asset Management Limited is committed to ensuring that all its Employees work in a conducive environment and are given a platform to freely express their concerns on various matters pertaining to any malpractice, actual/suspected fraud, violation of the Code of Conduct and Ethics, breach of any policies of the Company, abuse of power and authority by any official of the Company, leakage or suspected leakage of AMC Unpublished Price Sensitive Information, leakage or Suspected leakage of Bajaj Finserv Mutual Fund Unpublished Price Sensitive Information or any other act with an intention of unethical personal gain or to cause damage to the Company or its Employees, etc.

## 2. Objective

Objective of this policy is –

1. To mandate all employees to work with integrity, ethics and responsibility.
2. Define necessary actions in respect of any concern expressed, complaints lodged, or instances reported by AMC Directors, Trustee Directors, Employees of AMC and Trustee or other stakeholders through the Whistle Blower mechanism.
3. Create adequate safeguards against victimization of Director(s) of AMC and Trustee, Employee(s) of AMC and Trustee or other stakeholders who use this Whistle Blower mechanism to express their concerns, lodge complaints or report instances.

## 3. Applicability:

This Policy is applicable to all the Employees of AMC and Trustee (on-roll & off-roll), Directors of AMC and Trustee and other stakeholders such as actual and potential clients, investors/unit holders, shareholders, vendors, suppliers, business contacts, customers, contractors, lenders, borrowers, consultants, service providers, brokers, distributors, intermediaries, trustees, representatives, subcontractors, agents, advisers and government & public bodies (including their advisers, representatives and officials).

## 4. Reporting a complaint:

A Whistleblower/Complainant can report instances, express concerns and lodge complaints, of, about and on various matters pertaining to any malpractice, actual/suspected fraud, fraudulent practice, unfair or unethical practice, violation of regulatory or legal requirements or governance vulnerability, violation of the Code of Conduct and Ethics, breach of any policies of the Company, abuse of power and authority by any official of the Company causing loss to the Company or any other act with an intention of unethical personal gain or to cause damage to the Company or its Employees, by writing to the Enforcement Committee at [whistleblower@bajajamc.com](mailto:whistleblower@bajajamc.com).

Before reporting such events, the complainant must ascertain that a violation has actually occurred and that the act is not based on what can be termed as a normal business decision. In all such cases, the complainant will address the complaint to any member of the Enforcement Committee along with the available details and evidence to the extent possible. In case the complaint is received by a person other than an Enforcement Committee member, the same will be forwarded by them to the Enforcement Committee.

The Enforcement Committee may meet the complainant, if necessary. They may also appoint any suitable person or group of people to investigate the case but will ensure that the identity of the complainant is protected.

The Enforcement Committee will decide the case and recommend action within four weeks to the CEO. The final action to be taken will be decided by the CEO.

The analysis of the case and the action to be taken may not be communicated to the original complainant.

The Directors of AMC and Trustee in all cases and employee in appropriate or exceptional cases will have direct access with the Chairman of the Audit Committee. This provision is made available in case of a complaint involving the CEO.

In case there is any other feedback or input like unprofessional behavior, etc. that may not fall under the scope of this policy, can be reported to [confidentialfeedback@bajajamc.com](mailto:confidentialfeedback@bajajamc.com)

## 5. Enforcement committee:

Enforcement Committee will consist of:

1. Head – Human Resources
2. Head – Compliance, Legal & Secretarial
3. Head – IT
4. Head – Risk Management
5. Head – Marketing

Head – Human Resources will chair the Enforcement Committee. The Enforcement Committee will report to the CEO. Any grievance against any member of the Enforcement Committee should be addressed to the CEO.

**Conflict of Interest** - In case of any complaint or concern or reporting of instances against any of the members of the Enforcement Committee, the said member(s) shall be required to recuse himself/herself from the proceedings and be replaced with a temporary ad-hoc committee member as appointed by the CEO till the complaint lodged or concern expressed, or instances reported against him/her is disposed of. All such complaints must be directly reported to the CEO / Managing Director.

## 6. Protection of Whistle Blower / Complainant:

No unfair treatment will be meted out to a Whistleblower/Complainant by virtue of his/her having expressed concern or lodged complaint or instance reported under this Policy.

The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against a Whistleblower/Complainant. Complete protection will, therefore, be given to Whistleblower/Complainant against any adverse action, i.e., no action will be taken against the Whistleblower/Complainant solely on the basis of Whistleblower/Complainant having expressed concern, lodged complaints or reported instances. Such actions include retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or any direct or indirect use of authority to obstruct the Whistleblower's/Complainant's right to continue to perform his duties/functions, including expressing, lodging or reporting, further concern, complaint or instances, as the case may be ("Adverse Actions"). The Company reserves the right to initiate appropriate action against persons who are seen to be undertaking Adverse Actions against a Whistleblower, only on the account of Whistleblower expressing concern, lodging complaint or reporting instances under this policy.

The identity of the Whistleblower/Complainant will be kept confidential to the extent possible given the legitimate needs of law and the investigation.

Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention.

## 7. Non-coverage:

This policy will not cover the following types of complaints which if made, will not be considered under this Policy:

- Complaints that are frivolous, vague or incoherent
- Matters which are pending before a court of law, tribunal, other quasi- judicial bodies or any governmental authority
- Business and financial decisions taken by the Company that do not involve wrongdoing or illegality
- Allegations relating to sexual harassment
- Matters relating to a personal/employee related grievance including concerning appraisals, compensation, promotions, rating in performance appraisal and or conduct of seniors, etc.

Employees can lodge these complaints / grievances as per the mechanism provided under other relevant policies like POSH, Code of Ethics, DAC.

## 8. Review frequency:

The Policy shall be reviewed at least annually or need basis.

## ANNEXURE A

Contact Details of Enforcement Committee:

Sl.	Name	Designation	Contact details	E-mail ID
1	Vaibhav Date	Head - Human Resources	020 6767 2526	vaibhav.date@bajajamc.com
2	Harish Iyer	Head - Compliance, Legal and Secretarial	020 6767 2503	harish.iyer@bajajamc.com
3	Niranjan Vaidya	Head - Information Technology	020 6767 2520	niranjan.vaidya@bajajamc.com
4	Anu Singhee	Head - Risk Management	020 6767 2517	anu.singhee@bajajamc.com
5	Royston Netto	Head - Product & Marketing	020 6767 2527	royston.netto@bajajamc.com