

A. WHISTLE BLOWER POLICY

APAC is committed to adhere to the highest standards of ethics, including moral and legal, for conducting business. APAC has also adopted a Code of Ethics and Business Conduct which lays down the principles and standards that govern the actions of the Company and its employees. Any actual or perceived violation of this code or our ethical standards is a matter of serious concern to the Company. The role of employees and other associates working at the ground level cannot be undermined in such situations. This policy has been formulated to allow such concerns to be raised directly to the highest authority in the Company and gives full protection against victimization to any such whistle blowers, besides ensuring a time bound investigation of the concern raised.

1. Scope

Various stakeholders are eligible to make protected disclosures under this policy. The stakeholders may fall in the following broad categories

- a) Employees of the Company.
- b) Employees of other agencies/vendors/ suppliers/ or agencies deployed for the Company's activities or providing material or services to the Company
- c) Customers of the Company
- d) Any other person associated with the Company

The Policy covers all malpractices already covered as infractions in the Company's Code of Conduct, as well as violation of any other general ethical, moral or legal code.

This policy should not be used to raise a grievance or as a route for raising malicious or unfounded allegations against colleagues.

2. Anonymous Allegations

As a rule, the Company will ordinarily investigate all allegations, even if anonymous. However for better outcome, whistle-blowers are encouraged to put their name to the complaint.

3. Protection of Whistleblower

If anyone raises a concern under this policy, he / she will not be at a risk of suffering any kind of reprisal or retaliation including discrimination, harassment, or vengeance in any manner, irrespective of the outcome of the investigations, provided that

- a) The disclosure has been made in good faith
- b) He/she reasonably believes that the information and any allegations contained in it are substantially true and
- c) He /she is not acting for personal gain.

However, anyone who abuses this policy (raises a concern knowing it to be untrue) will be subject to disciplinary action.

4. Responsibilities of the whistleblower

- a) Raise the concern early on to reduce financial loss/ loss of evidence
- b) Avoid anonymity while raising a concern
- c) The intent of this policy is to raise concerns which are genuine and serious and it is not intended for petty disclosures. Malicious allegations by employees may attract strict disciplinary action.
- d) In exceptional circumstances, when the concern does not seem to be handled speedily or to the satisfaction of the whistleblower, he /she may further escalate the matter to the Chairman of the Company.

5. Whistle Blower Process and Whistle Blower Committee

All concerns can be raised via an email to whistleblower@apacfin.com. This email is mapped directly to the CEO and the Chief People Officer of the company. The Management, depending upon the seriousness of the concern raised, will appoint a Whistle Officer/ Whistle Committee to further investigate the concern.

Responsibilities of the Whistle Officer/Committee

- a) Acknowledge the complaint within 7 days of appointment of the Whistle Officer/ Committee.
- b) Conduct the investigation in a fair and unbiased manner
- c) Ensure complete fact finding, meet all witnesses required, submit a report and recommend action
- d) Complete the investigation as soon as feasible but no later than 2 months from date of receipt of complaint.
- e) Maintain complete confidentiality while conducting the investigation.

6. Rights of the subject against whom the allegations have been made

- a) Subjects have the right to be apprised of the concern raised when appropriate, and must be given adequate time and opportunity to be heard on the subject
- b) Subjects have the right to be informed of the outcome of the investigations in writing

1. Other points

In case the Officer/Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action may be initiated by the Management for making a police complaint. At the end of each financial year, the Officer/Committee shall submit a report on all complaints and their status to the board of the relevant company.

Guidelines in the above policy can be relaxed only in exceptional cases with the written approval of the CEO & the Group Chief People Officer.