

### Document Details

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**EASEBUZZ PRIVATE LIMITED****WHISTLEBLOWER POLICY****Table of Content**

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**1. INTRODUCTION**

At, Easebuzz Private Limited ("Easebuzz"), we are committed to conduct our business with honesty and integrity at all times. These values are the foundation of how we conduct ourselves and interact with each other, our merchants, members, shareholders and other stakeholders. Easebuzz ensures to promote corporate compliance and ethical corporate culture and in case at any time these obligations are not followed or any concern is raised, Easebuzz will endeavor to identify and remedy such situation.

**2. PURPOSE**

This policy provides a platform and mechanism for the Whistleblower who suspects or discloses any concerns or grievances about any unprofessional and unethical conduct without any fear of reprisal and offers full protection provided that such disclosure/concern raised/ allegation made by the Whistleblower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Easebuzz's values and code of conduct.

Further, the policy is intended to encourage the Whistleblowers to voice their concerns on irregularities, malpractices and other wrongdoings assuring them with confidentiality and

protection from personal vindictive actions such as humiliation, harassments or any other form of unfair treatment.

### 3. DEFINITIONS

- i. **"Whistleblower"** means any person who makes any protected disclosure of fraud, corruption or wrongdoings under this Whistleblower Policy.
- ii. **"Applicable Laws"** means all applicable laws, statutes, enactments, acts of central or state legislature, ordinances, rules, regulations, notifications, guidelines, directions, directives, policies, circulars, decisions and any other pronouncements issued in accordance with the Companies Act, the RBI Master Directions or any other law applicable to the jurisdiction of India by any central, state, local, or other governmental, administrative or regulatory authority exercising executive, legislative, judicial, regulatory or administrative functions of or pertaining to the government.
- iii. **"Board"** means the Board of Directors of Easebuzz
- iv. **"Companies Act"** means the Companies Act, 2013 as amended and modified from time to time
- v. **"Easebuzz"** means Easebuzz Private Limited, a company incorporated under Companies Act, 2013
- vi. **"Employee"** means former and current Employee of Easebuzz, Directors, or any other personnel related or engaged by or on behalf of Easebuzz.
- vii. **"Protected Disclosure"** means any disclosure made in good faith by the Employee that discloses such specific information that may be unethical and amounts to fraud, corruption or wrongdoing under this Whistleblower Policy.
- viii. **"Subject"** means the person against whom such Protected Disclosure has been made or such evidence have been produced which may amount to conduct investigation under this Policy.
- ix. **"Whistleblower Committee"** means the committee constituted by the Board to investigate under the Applicable Laws.
- x. **"Whistleblower Policy" / "Policy"** means this Whistleblower policy as approved and adopted by the Board

### 4. SCOPE OF POLICY

Easebuzz's point of view on whistle blowing is applicable to

- i. All the Board members;
- ii. Current and former employees;
- iii. Consultants;

- iv. Other staff members or
- v. Any other person related to Easebuzz

to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) against the Subject without retribution.

The Policy covers malpractices and events which have taken place/suspected to have taken place during the course of Business involving: -

- i. Corruption
- ii. Frauds
- iii. Misuse/abuse of official position
- iv. Manipulation of data/documents
- v. Any other act of the employee which affects the interest of Easebuzz adversely and has the potential to cause financial or reputational loss to Easebuzz.

## **5. GOVERNING LAWS**

Section 177 Clause 9 of The Companies Act, 2013 read along with Rule 7(1)(b) of the Companies (Meetings of Board and its Powers) Rules, 2014 requires Easebuzz to establish a Whistleblower Policy for its Employees to report their genuine concerns or grievances.

## **6. REPORTING MECHANISM/PROCESS**

Whistleblowers are encouraged to share the information or complaint or suggestions if they believe the said information/complaint/suggestions is considered to be a Protected Disclosure against the Subject as per Whistleblower policy through a written notice or E-mail as soon as possible and in any case not later than 45 days after he/she becomes aware of the same.

The subject of the written notice or E-mail should be "*Protected Disclosure under Whistleblower Policy*" or "*Private and Confidential*". Employees are encouraged to include their name and contact information while disclosing however, it will be on the discretion of the Whistleblower whether to disclose his/her identity or keep himself/herself anonymous while raising such Protected Disclosure.

It is recommended that the Protected Disclosure is communicated to the Employees supervisor, or reporting manager by the Employee; however, in case Employee is not comfortable in speaking up with his/her supervisor/reporting manager or is not satisfied with the response from the supervisor/reporting manager, then in such case the Employee can produce such Protected Disclosure to the Whistleblower Committee/HR at below mentioned addresses: -

1. Chairman of the Whistleblower Committee  
Mr. Vikram Chachra  
[vikram@8i.vc](mailto:vikram@8i.vc)
  
2. Member of the Whistleblower Committee  
Mr. Amit Kumar  
[amit@easebuzz.in](mailto:amit@easebuzz.in)
  
3. Member of the Whistleblower Committee  
Mr. Siddharth Dani  
[siddharth@capsurge.in](mailto:siddharth@capsurge.in)

In case the whistle blower reporting is against any of the aforesaid committee members, then the Whistleblower may reach out to head of the HR / Legal Team who will further escalate the matter to the Board of Directors of the Company.

In case the Protected Disclosure cannot be made by the Whistleblower in writing, then any member of the HR Team shall assist such Whistleblower in making the Protected Disclosure in writing.

The HR Team may extend the time period for making a Protected Disclosure if it is satisfied that genuine circumstances prevented the Whistleblower from making the Protected Disclosure within the prescribed period. The reasons for extending the time period shall be recorded by the HR Team in writing.

## **7. ESCALATION MATRIX**

Upon receipt of a complaint, the Chairman of the Whistleblower Committee will (i) determine whether the complaint actually pertains to accounting or other relevant matters and (ii) when possible, acknowledge receipt of the complaint to the sender. The investigator is responsible for overseeing the investigation; and for contacting other individuals with the required knowledge and expertise to perform an effective investigation.

If the Whistle Blower/Complainant is not satisfied with the response of the Whistleblower Committee or is not satisfied with the decision of the Investigating/Whistleblower Committee he/she is free to take up the matter with the Board of Directors through written

communication for reconsideration.

## **8. RIGHTS AND RESPONSIBILITIES OF THE WHISTLEBLOWER**

The below mentioned clauses must be duly noted and followed by the Whistleblower while disclosing or raising any alleged concern or allegation

- i. The Whistleblower should immediately inform any suspected or actual event to his/her supervisor or reporting manager with all specific and verifiable details in an appropriate language that is not offensive.
- ii. In order to support their disclosure, the Whistleblower should provide sufficient evidence to establish a prima facie case for investigation.
- iii. Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of Easebuzz and members of its Board and staff.
- iv. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
- v. Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumour. This also means that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

## **9. PROTECTION OF WHISTLEBLOWER**

The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or Easebuzz. All reasonable steps will be taken to minimize the difficulties, which the Whistleblower may experience as a result of making a Protected Disclosure.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with ulterior intent/motive, the Whistleblower Committee should take appropriate disciplinary or legal action against the concerned whistleblower.

Any other person or Employee assisting the Whistleblower or the HR Team, the Whistleblower Committee, or any investigator will also be protected to the same extent

as the Whistleblower.

#### **10. CONFIDENTIALITY**

The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

The Whistleblower, the HR Team, members of the Whistleblower Committee, the Subject(s) and everybody involved in the investigation process, must act in good faith and maintain confidentiality of the Protected Disclosure, the investigations and all allied matters. Any breach of this confidentiality obligation will be viewed very seriously and lead to such disciplinary action as the Whistleblower Committee, or as the case may be, the Board, may deem fit.

#### **11. OUTCOME OF INVESTIGATION**

If an investigation leads to conclusion that an improper or unethical act has been committed, the chairman of the Whistleblower Committee shall recommend to the management of Easebuzz to take such disciplinary or corrective action as the chairman of the Whistleblower Committee deems fit. It is clarified that any disciplinary or corrective action initiated against the Subject are proved as a result of the findings of an investigation pursuant to this Whistleblower Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

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