



Policy

Regulation

Procedure

(High)

Title: Whistleblower Policy

AMENDMENT/ABOLITION RECORD

Version	Establishment or Amendment	Effective Date	Description of Change
00	2 nd January, 2015	16 th January, 2015	Initial Version
01	2 nd January, 2017	2 nd January, 2017	Amended as per audit findings
02	26 th April, 2018	1 st May, 2018	Policy re-designed and handed to Legal & Compliance
03	3 rd August, 2021	4 th August, 2021	Policy re-designed by addition of Legal Attorney Hotline, abolition of Whistleblower Committee & Appendix, inclusion of Decision Making Authority and other amendments.
04	22 nd Feb, 2022	01 st March, 2022	Amendments in Section 4: channel for complaint as per audit observation. Amendments in Section 7: Department in charge as per organization structure. Amendments in Section 8: Revision and abolishment as per organization structure.
05	26 th July, 2022	26 th July, 2022	Amendments in Section 3: Decision Making Authority Amendments in Section 4: Channel for Complaint.
06	14 th October, 2022	19 th October, 2022	Amendments due to change in Organization Structure

Note: The amendment or abolition of the document shall be done in accordance with Policy of Policy Control of AEON Credit Service India Private Limited.

Mumbai, **18th October, 2022**

Approved by Executive Committee

Mr. Keiichi Nambu
Managing Director

Remarks:

Policy	The fundamental principles / rules / philosophy of which the Company shall base on with respect to the business administration and the process of making organizational decisions.
Regulation	The complementary details based on Policy
Procedure / Flow	Operational procedures / flows / methods based on Policies and Regulations to manage the administrative matters.



Table of Contents

Section 1	Purpose	3
Section 2	Definition.....	3
Section 3	Decision Making Authority.....	3
Section 4	Channel for Complaint.....	3
Section 5	Protection to Disclosure of the Whistleblower.....	4
Section 6	Coverage of Policy/ Nature of Complaints	5
Section 7	Department in-charge	5
Section 8	Revision and Abolishment.....	5



Section 1: Purpose

The Purpose of Whistleblower Policy (“Policy”) is to outline the mechanism through which any Stakeholder / Whistleblower can raise the complaint or blow the whistle, regarding any non-compliant activity within AEON Credit Service India Pvt. Ltd. (“Company”) which is in deviation of the AFS Group Compliance Policy. The objective behind this Policy is to maintain good governance within the Company and to encourage bonafide disclosures.

Section 2: Definition

- a) **Stakeholder:** Stakeholder includes any staff / employee as defined under Working Policy of the Company or any ex-staff / ex-employee or any third party associated with the Company.
- b) **Whistleblower:** Whistleblower means any person including Stakeholder, reporting the matter/complaint under this Policy.

Section 3: Decision Making Authority

The Managing Director of the Company:

- a) shall determine whether the matter/complaint reported under this Policy, warrants any action and accordingly may forward the matter/complaint to the Disciplinary Action Committee (DAC) for necessary action or direct the concerned Head of Department to take necessary corrective steps; and/or
- b) shall include / appoint any person/s for investigation of the matter/complaint received under this policy, if deemed necessary.

However, the Managing Director of the Company may discuss the matter or complaint with other Executive Directors, if required, before deciding the actionables or calling for DAC meeting.

Section 4: Channel for Complaint

- a) All Stakeholders are encouraged to identify and report the instances which are against the interests of the Company including improper and unethical behaviour.
- b) Complaint can be lodged / reported anonymously or if the Whistle blower chooses to identify himself/herself, the identity of such person shall be protected.
- c) The complaint/information may be reported through the channels as detailed below:

1) **Company’s Code of Conduct Hotline:**

i. AEON Credit Service India (Pvt.) Ltd.

By Post: The Managing Director,
AEON Credit Service India Pvt. Ltd.,
TF-A-01, Art Guild House, Phoenix Marketcity,
LBS Marg, Kurla (West), Mumbai - 400070.

By Telephone: 022-62664889

By E-Mail: wb@aeoncredit.co.in



ii. Complaint against Directors:

If there is any complaint to be filed against any of the Directors, then the Complainant can file his/her complaint directly to the Managing Director of the Company on his official email ID - keiichi_nambu@aeoncredit.co.in.

However, if the complainant wants to escalate or file the complaint to AFS, he /she can refer the AFS Code of Conduct Hotline.

2) **AFS Code of Conduct Hotline:**

AEON Financial Service Japan

By Post: AEON Financial Service Japan,
12F, Terrace Square, 3-22,
Kandanishiki-cho, Chiyoda-ku,
Tokyo, 101-0054, Japan.

By E-mail: afs110@aeonfinancial.co.jp

3) **AEON Code of Conduct Hotline**

Website: <https://aeon-ethics.secure.force.com>

Login: ACSI002

Password: 9999

4) **Legal Attorney Hotline**

By E-mail: report_aeonglobal@yglpc.com

Include the following when sending an email.

- (1) Reporting person: company name and contact information
(department name and reporting person's name, if possible)
- (2) Person being reported, company name, department, and title.
- (3) Details of the breach or misconduct (be specific and based on the facts)

The (Overseas) Legal Attorney Hotline is commissioned by AEON Group, which can be used for reporting of any misconduct, including violation of laws or internal policies by the management of the Company i.e. above Asst. Vice President (Senior General Manager as defined in AFS Policy).

Section 5: Protection to disclosure of the Whistleblower

In order to ensure protection to the Whistleblower, the Company will be taking following measures:

- a) Maintain confidentiality of the name of Whistleblower and the subject matter reported through Whistleblower channel.
- b) Protect Whistleblower from any fear of biasness, power harassment, or any action linked to the subject matter in future, due to reported incident/facts.
- c) Any other harassment from the interested parties directly or indirectly, will be protected by the Company.



Section 6: Coverage of Policy/Nature of Complaints

Any small/petty matters in connection with any department, which may be discussed or resolved within the department level are advised not to be reported through Whistleblower channel.

The Policy covers malpractices and events that may take place in the Company, which includes the following:

- a) Abuse of authority.
- b) Breach of Code of Conduct or Ethics, Policy or employment contract.
- c) Manipulation of Company data/records.
- d) Financial or compliance irregularities, including fraud, or suspected fraud.
- e) Criminal offence having repercussions on the Company or its reputation.
- f) Unauthorized use/distribution of confidential/proprietary information.
- g) Deliberate violation of law/regulation.
- h) Misappropriation or misuse of Company funds/assets.
- i) Breach of employee's Code of Conduct or Rules.
- j) Any other illegal, unethical, imprudent deed / behavior or actual or suspected fraud.

Whistleblower Policy should not be used as a route for raising malicious or unfounded allegations against colleagues.

If any stakeholder, encounters any of the above instances/events, they can report it through the Whistleblower mechanism.

The above list is illustrative and not exhaustive. Any other matter/complaint against the interests of the Company, reported through Whistleblower channel may also be dealt, in accordance with the Whistleblower Policy.

Section 7: Department In-Charge

The Department in charge for handling this policy shall be Legal & Compliance Department.

Section 8: Revision and Abolishment

Revision and abolishment of this Policy shall be planned and conducted by the Legal & Compliance Department. Revision and abolishment of this Policy requires an appropriate approval of the Executive Committee.

The Legal & Compliance Department shall review this Policy annually or as and when required, pursuant to the changes in law / business environment or strategy requirements or developments of Policy of Policy Control.