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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
07	7 th September, 2023	12 th September, 2023	To incorporate changes in Whistle Blowing contact point as required by AFS Amendments due to change in Organization Structure
08	4 th December, 2024	11 th December, 2024	Addition of section 5 (Information and Instructions) Amendment in the email id under Section 4 (ii)

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, 10th December, 2024

Approved by Executive Committee

Mr. Sanjaya Kumar Dash

Whole Time Director & Company Secretary (Acting MD)

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.



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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 Private Limited. ("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) ACS India Compliance 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 hotline@aeoncredit.co.in

However, if the complainant wants to escalate or file the complaint to AFS, he /she can refer the AEON Compliance Hotline.

2) AEON Compliance Hotline:

a) AEON Financial Service Japan

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

b) Website: <https://aeon-ethics.my.salesforce-sites.com/>

Login: ACSI002

Password: 9999

3) 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: Information and Instructions

- a) Posting to the Web Service is available to all persons (including board members) working at all overseas subsidiaries and retired persons.
- b) Illegal or unethical conduct (infringement of rights, harassment, etc) may also be reported by family members of AEON employees as well as AEON client employees.
- c) Reports received through Web reporting or the legal attorney hotline will be reported to AEON Co., Ltd. in-company hotline.
- d) After verification at AEON CO.,Ltd., reported information, including personal information, will be disclosed to managers at each company unless otherwise specially requested.
- e) Reports are not to be made for personal gain, based on a personal grudge, or to defame or achieve any otherwise illicit purpose.
- f) The person reporting must not divulge, leak or broadcast, neither through gossiping, social media or otherwise, any reported facts, information, opinions of hotline attendants or company employees, progress of action taken, results of action taken at any companies, etc.
- g) To protect a reporting person or person cooperating with an investigation, such a person shall not be made the subject of disadvantageous treatment where reporting or providing a response is the reason.
- h) ID and password used are to be those assigned by the company of employment.

Section 6: 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 7: 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 8: Department In-Charge

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

Section 9: Revision and Abolishment

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

The Legal 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.