



Anson Fincorp Private Limited

**Reg. Office: Door No. XIV/1057, Anson Tower, B. Ed College Junction, Nedumkandam P.O,
Nedumkandam, Idukki, Kerala - 685553 India**

WHISTLEBLOWER & VIGIL MECHANISM POLICY

<u>Version Control</u>		
Version Number	Description	Date
Version - 1	Approval	24.04.2024

Effective Date	25.04.2024
Prepared by	Secretarial Department
Custodian	Company Secretary
Reviewed by	Board of Directors
Approved by	Board of Directors

1. Introduction

This Policy is established in accordance with Section 177(9) and (10) of the Companies Act, 2013 and Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 and in accordance with the applicable provisions of the Reserve Bank of India's Master Direction on Non-Banking Financial Company – Scale Based Regulation (SBR) Directions, 2023 and the Reserve Bank of India (Non-Banking Financial Companies – Governance) Directions, 2025 dated November 28, 2025. As a Base Layer NBFC, **Anson Fincorp Private Limited** ("the Company") is committed to maintaining the highest standards of ethical conduct, transparency, accountability and corporate governance.

This mechanism enables Directors and Employees of the Company to report genuine concerns relating to unethical behaviour, actual or suspected fraud, violation of company policies, misuse of authority, financial irregularities or any malpractice—without fear of retaliation or victimisation.

2. Objective of the Policy

The objectives of this policy are:

- i. To provide a secure and confidential mechanism for reporting concerns.
- ii. To encourage ethical and responsible conduct.
- iii. To ensure fair investigation and timely resolution of reported matters.
- iv. To protect Whistle Blowers from victimization.

3. Short Title and Commencement

This Policy shall be known as the "**Whistle Blower Policy & Vigil Mechanism Policy**" and shall come into force from the date of adoption by the Board of Directors.

4. Definitions and Interpretations:

- a) '**Authorized Director**' means the Director authorised by the Board to discharge the functions in lieu of Audit Committee for the purposes of this Policy.
- b) '**Company**' means **ANSON FINCORP PRIVATE LIMITED**.
- c) '**Complaint**' means written communication made under this Policy regarding unethical behavior, actual or suspected fraud, or violation of the Company's Code of Conduct or policies.
- d) '**Complainant**' means a Director or Employee who has made a Complaint under this Policy.
- e) '**Designated Authority**' means the Company Secretary for the time being.

- f) **'Employee'** means every employee of the Company including the Directors in the employment of the Company.
- g) **'Fraud'** includes any act, omission, concealment of any fact or abuse of position committed by any employee or committed with his connivance in any manner, with intent to deceive, to gain undue advantage from, or to injure the interests of the Company or its employees.
- h) **'Investigator'** means any person or panel authorised by the Designated Authority or Authorized Director to investigate a Complaint.
- i) **'Risk Management Committee'** means a committee constituted to examine complaints received under this Policy.
- j) **'Senior Management Team'** means the committee constituted by the Company for the purposes of this Policy, comprising the following officers:
 - i. Vice President – Human Resource
 - ii. Company Secretary
- k) **'Unethical behavior'** includes the illustrations below:
 - a. Abuse of authority.
 - b. Action aimed at taking advantage by impersonating another person without his knowledge or consent.
 - c. Financial irregularities.
 - d. Disclosure of confidential / proprietary information to unauthorized persons.
 - e. Wastage / misappropriation of Company's funds/assets.
 - f. Non-conformance to reasonable standard of social or professional behavior.
 - g. Any other biased, imprudent or imprudent action.
- l) **'Victimisation'** means punishment or discrimination against the Complainant selectively or unfairly.

In this Mechanism, words importing the masculine shall include feminine and words importing singular shall include the plural or vice versa

5. Eligibility

All Directors on Board and all Employees of ANSON FINCORP PRIVATE LIMITED are eligible to make a Complaint under this Mechanism.

6. Protection of Complainant

- i. The identity of the Complainant shall be kept confidential to the extent possible and permitted by law.
- ii. No Complainant shall be subjected to victimisation or harassment for reporting a concern in good faith.

- iii. If the Complainant is required to participate in any inquiry or proceedings, necessary support or reimbursement of eligible expenses shall be provided as per Company policy.
- iv. Protection shall not extend to complaints made with malicious intent or false information.
- v. Any other employee assisting in the investigation or furnishing evidence with regard to a Complaint shall also be protected.

7. Procedure for filing a Complaint

Complaints may be addressed to:

Designation	Name & Contact details
Designated Authority	Company Secretary Anson Fincorp Private Limited, Door No. XIV/1057, Anson Tower B.Ed College Junction, Nedumkandam P.O, Nedumkandam, Idukki, Kerala - 685553 Ph : 9995809698 Email : companysecretary@anson.co.in
Authorized Director	Regi Jacob Managing Director, Anson Fincorp Private Limited, Door No. XIV/1057, Anson Tower B.Ed College Junction, Nedumkandam P.O, Nedumkandam, Idukki, Kerala - 685553 Ph: +91 9447000244 Email: regi@anson.co.in

- a. Complaints should be submitted within 30 days of awareness and marked as "Complaint under Vigil Mechanism – Confidential". They may be sent by sealed envelope or to the official email of the Designated Authority at companysecretary@anson.co.in. In exceptional cases involving conflict of interest, the Complainant may directly approach the Authorized Director. If the complaint is against the Designated Director, the Complainant may directly approach the Board of Directors through the Designated Authority, who shall place the complaint before the Board without delay.
- b. Anonymous complaints shall ordinarily not be entertained; however, if such complaints contain verifiable evidence of serious misconduct, the Designated Authority may refer them for preliminary examination.
- c. If the Authorized Director is not in position due to any reason, then the senior Management Team shall discharge the functions of the Authorized Director, under this Policy.
- d. If the envelope is not properly closed or not duly superscribed, the Complaint may not be entertained because it will not be possible to conceal the identity of the Complainant in these circumstances.

- e. Complaints should be written in Malayalam, Tamil, or English, in legible handwriting or typed form, and should contain sufficient details to enable assessment and investigation.
- f. The Complaint should contain the Complainant's name, address, and contact details, which will be kept confidential.
- g. The Complainant may not enter into any correspondence with the Designated Authority / Authorised directors in his own interest. If any further information / clarification is required, the Complainant will be contacted directly.

8. Action on the Complaints

- a. The Designated Authority shall verify the authenticity of the Complaint and forward it to the Risk Management Committee after concealing the Complainant's identity.
- b. On receipt of the Complaint, the Risk Management Committee will make preliminary inquiry within one month to ascertain whether there is any factual basis to investigate the Complaint, wherever considered appropriate.
- c. If the Risk Management Committee, as a result of the inquiry or otherwise, is of the opinion that the Complaint is to be further investigated, it will recommend accordingly to Designated Authority.
- d. On receipt of the recommendations of the Risk Management Committee, the Designated Authority, as the case may be, shall decide whether to forward the Complaint to the investigator for further investigation or close the Complaint or the Complaint is to be investigated otherwise depending on the nature of the Complaint.
- e. In connection with the Complaint, if the Investigator requires, for the purpose of any investigation, assistance of any employee who in his opinion shall be able to furnish information or documents relevant to the investigation or otherwise assist in the investigation, he may seek such assistance.
- f. If the Investigator, as a result of investigation, is of the opinion that the complaint 'stands' or the complaint is found to be false, motivated or vexatious, he may send the report / outcome of the investigation to the Designated Authority within three months from the date of forwarding of the Complaint to him.
- g. On receipt of the report / outcome of the Complaint from the Investigator, the Designated Authority shall submit the matter to the Authorized Director.
- h. If an investigation leads the Investigator to conclude that an improper or unethical act has been committed, the Authorized Director shall direct the management of the Company to take such disciplinary or corrective action as the Investigator deems fit.
- i. A formal closure letter shall be sent to the Complainant informing decision of Designated Authority.

9. Grievance regarding disposal of Complaints

If the Complainant feels aggrieved with the final action taken on his complaint or if he feels that protection to which he is entitled to has not been provided, then he may make a representation of his grievance in writing to the Authorized Director, who will take such action as may be deemed fit to redress the grievance.

10. Confidentiality

The complainant, Designated Authority, Authorized Director, Members of Risk Management Committee, Investigator, the Subject and everybody involved in the process shall, maintain confidentiality of all matters under this Policy, discuss only to the extent or with those persons as required under this policy for completing the process of investigations and keep the papers in safe custody.

11. Protection

No unfair treatment will be meted out to a Complainant by virtue of his/ her having reported a complaint under this policy. Adequate safeguards against victimisation of complainants shall be provided. The Company will take steps to minimize difficulties, which the Complainant may experience as a result of making the Complaint. The identity of the Complainant shall be kept confidential to the extent possible and permitted under law. Any other employee assisting in the said investigation shall also be protected to the same extent as the Complainant.

12. Disqualifications

While it will be ensured that genuine Complainants are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action. Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Complainant knowing it to be false or bogus or with a mala fide intention. Complainants, who make any Complaint, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable to be prosecuted.

13. Periodic Reporting

The Designated Authority shall submit a quarterly report on all complaints received, investigated, and resolved to the Authorized Director and the Board of Directors.

14. Retention of Documents

All Complaints in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of seven years.

15. Amendment

This policy may be amended at any time with the approval of the Board of Directors of the Company, on the recommendations of the Authorized Director of the Company.

16. Disclosure

The details of establishment of this Vigil Mechanism shall be disclosed in the Board's Report and placed on the Company's website in accordance with the Companies Act, 2013 and the applicable RBI regulations.

17. Review of Whistle Blower Policy

The Whistle Blower Policy shall be reviewed at least once every two years, or earlier if warranted due to operational requirements or regulatory changes.
