

WHISTLEBLOWER POLICY

POLICY OBJECTIVE

To provide employees, business coordinators, district coordinators, customers and vendors an avenue to raise concerns, in line with the commitment of FINO* to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.

To provide necessary safeguards for protection of employees from reprisals or victimization, for Whistle blowing in good faith.

SCOPE

All permanent employees, business coordinators, district coordinators, customers and vendors of FINO.

MAIN FEATURES

IMPROPER PRACTICE

The whistle blowing policy is intended to cover serious frauds that could have a large impact on FINO, such as actions (actual or suspected) that:

- May lead to incorrect financial reporting;
- Are not in line with applicable company policy;
- Are unlawful;
- Otherwise amount to serious improper conduct

COMPLAINANT (WHISTLEBLOWER)

An employee/ business coordinator /district coordinator/ customer/vendor making a disclosure under this policy are commonly referred to as a complainant (whistleblower). The complainant's role is as a reporting party, he/she is not an investigator. Although the complainant is not expected to prove the truth of an allegation, the complainant needs to demonstrate to the Ombudsperson, that there are sufficient grounds for the said fraud.

SAFEGUARDS

HARASSMENT OR VICTIMIZATION

Harassment or victimization of the complainant will not be tolerated and could constitute sufficient grounds for dismissal of the concerned employee.

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CONFIDENTIALITY

Every effort will be made to protect the complainant's identity, subject to legal & compliance constraints.

DISQUALIFICATION

ABUSE OF PROTECTION

While it will be ensured that genuine Whistle Blowers 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 Whistle Blower knowing it to be false or bogus or with a mala fide intention.

MALACIOUS ALLEGATIONS

False or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention may result in disciplinary action.

ANONYMOUS ALLEGATIONS

Anonymous mails will be automatic criteria for disqualification. However, subject to the seriousness of the issue raised the Ombudsperson can initiate an investigation independently.

MULTIPLE COMPLIANTS BY A SINGLE WHISTLEBLOWER

Whistleblowers, who make three or more complaints, which have been subsequently found to be mala fide, frivolous, baseless, malicious, or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy. In respect of such Whistleblowers, the Company/Audit Committee would reserve its right to take/recommend appropriate disciplinary action.

OMBUDSPERSON

The Ombudsperson will be a fulltime senior employee, well respected for his/her integrity, independence and fairness. He / she would be authorized by the Board of the company for the purpose of receiving all complaints under this policy and ensuring appropriate action.

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REPORTING

The whistle blowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported to the Ombudsperson.

INVESTIGATION

All complaints received will be recorded and looked into. If initial enquiries by the Ombudsperson indicate that the concern has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision documented. Where initial enquiries indicate that further investigation is necessary, this will be carried through either by the Ombudsperson alone, or by a Committee nominated by the Ombudsperson for this purpose. The investigation would be conducted in a fair manner, as a neutral fact finding process and without presumption of guilt. A written report of the findings would be made.

INVESTIGATION RESULT

Based on a thorough examination of the findings, the committee (or Ombudsperson) would recommend an appropriate course of action to the CEO of FINO. Where an improper practice is proved, this would cover suggested disciplinary action, including dismissal, if applicable, as well as preventive measures for the future. All discussions would be documented and the final report prepared.

In exceptional cases, where the complainant is not satisfied with the outcome of the investigation carried out by the Ombudsperson, he / she can make a direct appeal to the CEO of FINO.

INVESTIGATION SUBJECT

The investigation subject is the person / group of persons who are the focus of the enquiry/investigation. Their identity would be kept confidential to the extent possible.

REPORTING BY OMBUDSPERSON

The Ombudsperson will provide quarterly reports to the CEO with a copy to the Head-HR.

COMMUNICATION WITH COMPLAINANT

The complainant will receive acknowledgement on receipt of the concern. The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from him/her.

Subject to legal constraints, she / he will receive information about the outcome of any investigations.

CHANGES TO POLICY

This policy can be changed, modified, rescinded or abrogated at any time by FINO.

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Complainant

- Bring to early attention of the company any improper practice they become aware of
- Although they are not required to provide proof, they must have sufficient cause for concern.
- Avoid anonymity when raising a concern
- Co-operate with investigating authorities, maintaining full confidentiality
- Avoid making petty complaints

Ombudsperson

- Ascertain prima facie the credibility of the charge. If initial enquiry indicates further investigation is not required, close the issue
- Document the initial enquiry
- Where further investigation is indicated, carry this through, appointing a Committee, if necessary
- Provide quarterly reports to CEO/COO/CFO of FINO with a copy to the Head -HR
- Acknowledge receipt of concern to the complainant, thanking him/her for initiative taken in upholding the company's business conduct standards
- In case there is a complaint against the CEO/COO/CFO of the company, then the Ombudsperson would directly submit the report to the Audit Committee of the Board
- Ensure that necessary safeguards are provided to the complainant

Ombudsperson/ Committee

- Conduct the enquiry in a fair, unbiased manner
- Ensure complete fact-finding
- Maintain strict confidentiality
- Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom
- Recommend an appropriate course of action - suggested disciplinary action, including dismissal, and preventive measures
- Minute Committee deliberations and document the final report

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Investigation Subject

- Provide full co-operation to the Investigation team
- Be informed of the outcome of the investigation
- Maintain strict confidentiality

1 OMBUDSPERSON CONTACT DETAILS

Email: ombudsperson@finopaytech.com

Contact No: +91-9769012001

Address: Ethics Officer / Ombudsperson

FINO PayTech Ltd

Shree Sawan Knowledge Park

Plot No. D-507, Second Floor

MIDC Turbhe, Navi Mumbai- 400 705

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