

What is whistle blowing?

An employee or any other stakeholder provides useful information to the Company which has come to his / her attention regarding any act / incidence that is illegal, immoral, unethical, against the Company's Policy or has the possibility of leading to financial loss to the organization, its Employees or other stakeholders as well as leading to loss of reputation or punitive action by the regulators/government agencies.

Why did we develop this policy?

The Bank is committed to the highest standards of quality, honesty, openness and accountability. We have a responsibility toward our employees and other stakeholders. We recognize that given the dynamic business environment, our corporate governance practices must continue to evolve in order to remain relevant to the times. As such, we have incorporated a Whistle-blowing Policy and made available channels for reporting in confidence, unethical, immoral or illegal acts or practices.

Who can blow the Whistle?

1. Employees
2. Other Stakeholder (Customers, Unit Holders, Suppliers, Venders, Shareholders, Banks, brokers, etc.)

On what kinds of "improper, illegal, unethical or immoral practices" can blow the whistle?

Included but not limited to the following areas:

Financial Reporting - examples include: falsification or destruction of business or financial records, misrepresentation or suppression of financial information, non-adherence to Bank's internal financial reporting policy/controls.

Suspected Fraudulent Activity - examples include: theft, defalcation, cheating, criminal activity and unlawful or improper payments/transactions.

Breaches of the Guidelines and other Compliance Policies - examples include: manipulation, miscarriage of justice, corrupt practices including giving or receiving bribes or other improper benefits, conflict of interest concerns, illegal, deliberately seeking to conceal any of the foregoing, deceptive or anti-competitive sales practices, other violations of regulations, and non-adherence to Bank's defined policies.

Retaliation or Retribution against an Individual who Reports a Concern - examples include: conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual reporting a concern in good faith in accordance with this Policy.

How to blow the whistle?

You can also blow the whistle in writing at mailing address or email address of the Head of Internal Audit & Whistle blow Unit at which matters may be submitted in a sealed envelope marked "Private and Strictly Confidential" in a format as provided in the *Annexure "A"*.

Confidence and Protection

The investigation team will ensure that if the complainant has acted in good faith even though based on judgmental mistake, he is saved from any retributive action or from any sort

of harassment from the culprit. As “any action in retaliation or victimization against the whistleblower will not be tolerated.

However, this policy does not extend to anyone who maliciously raises a concern that is untrue. The investigation team may recommend to the extent of proceeding Disciplinary Action against such complainant.

All the staff members and stakeholders are advised to benefit out of “Whistle Blowing Unit” and come forward with genuine issues which may help the management to bring in necessary reforms and remedies making the ABPL a better place to work.