Whistleblower Policy

1. Objective: To encourage employees, BC Agents, and stakeholders to report genuine concerns about unethical behaviour, misconduct, fraud, or violations of CIGS policies or law, without any fear of retaliation, thereby promoting transparency, integrity, and good governance within CIGS.

2. Scope: This policy applies to all CIGS employees (permanent, temporary, contractual), Business Correspondent Agents (BC Agents) and any other individual working for or associated with CIGS in any capacity.

3. What Can Be Reported (Illustrative Examples):

3.1 Financial irregularities, fraud, or mismanagement of company assets.

3.2 Bribery, corruption, or kickbacks.

3.3 Conflicts of interest.

3.4 Unethical conduct or harassment of any sorts.

3.5 Breach of confidentiality.

3.6 Violation of CIGS policies, Codes of Conduct, or applicable laws and regulations (e.g., RBI guidelines for BCs, labour laws).

3.7 Manipulation of records or data.

3.8 Any other act that is illegal, unethical, or harmful to CIGS's or its business associates' (Banks, Insurance Companies, etc.) reputation or operations.

4. Reporting Mechanism:

4.1 Primary Reporting Channel:

4.1.1 Compliance Head: Mr. P. Ranganathan, Head – Compliance

4.1.2 Email: whistleblower@cigs.in

4.1.3 Physical Address: Head – Compliance, Commonwealth Inclusive Growth Services Ltd., No.27, Dr. Ambedkar Road, Kodambakkam, Chennai – 600 024 – Marked "Confidential - Whistleblower Report"

4.2 Second-level Escalation Channel (If no response within 10 days or if not satisfied with the response):

4.2.1 MD & CEO: Mr. Mahesh Ramachandran

4.2.2 Email: mahesh@cigs.in

4.2.3 **Physical Address:** Managing Director & CEO, Commonwealth Inclusive Growth Services Ltd., No.27, Dr. Ambedkar Road, Kodambakkam, Chennai – 600 024 – Marked "Confidential – Whistleblower Report – Second-level Escalation"

4.3 Final Escalation Channel (If no response within 10 days or if not satisfied with the response after Second-level Escalation):

4.3.1 **Chairman:** Dr. Mohan Kaul

4.3.2 **Email:** chairman@cigs.in

4.3.3 **Physical Address:** The Chairman, Commonwealth Inclusive Growth Services Ltd., No.27, Dr. Ambedkar Road, Kodambakkam, Chennai – 600 024 – Marked "Confidential – Whistleblower Report - Final Escalation"

5. Confidentiality & Anonymity:

5.1 CIGS will treat all reports with the utmost confidentiality.

5.2 Identity of the whistleblower will be protected to the extent possible, consistent with the need for a thorough investigation.

5.3 While anonymous reports will be considered, providing contact details may facilitate a more effective investigation.

6. Protection Against Retaliation:

6.1 No employee, BC Agent, or individual reporting a genuine concern in good faith will be subjected to harassment, discrimination, or any form of retaliation, regardless of the outcome of the investigation.

6.2 CIGS will take disciplinary action against anyone found to have retaliated against a whistleblower.

7. Investigation Process:

7.1 All reports will be promptly and thoroughly investigated by the designated authority (Compliance Head or MD & CEO or Chairman).

7.2 The investigation will be fair, impartial, and objective.

7.3 The whistleblower may be contacted for further information during the investigation.

7.4 Appropriate corrective and disciplinary actions will be taken based on the findings of the investigation.

8. Malicious or False Reports:

8.1 This policy is not intended to protect individuals who make false accusations maliciously or without reasonable basis. Such actions may lead to disciplinary measures.

9. Policy Review:

9.1 This policy will be reviewed periodically by the CIGS Management and Board of Directors to ensure its effectiveness and compliance with applicable laws.

Issued by: Board of Directors Commonwealth Inclusive Growth Services Limited

Date: 15th July 2025