



# TENCO HIRE PURCHASE & LEASING CO.PVT.LTD

Regd.Office: Gold Complex, Yesudas Road, Kunnamkulam, Thrissur District, Kerala - 680 503.

Admn Office: 2/388, 1st Floor, Vattipillaivar kovil Street, Ullur, Kumbakonam, Thanjavur District, Tamilnadu - 612 001.

## **Whistleblower Policy**

### **1. Introduction**

1.1. This Whistleblower Policy (the "Policy") is established by Tenco Hire Purchase and Leasing Co. Pvt. Ltd., hereinafter referred to as "the Company," in accordance with the requirements of the Reserve Bank of India (RBI) and applicable laws and regulations to provide a framework for employees and stakeholders to report concerns or complaints regarding unethical behavior, violations of laws, regulations, or the Company's policies and procedures, and other activities that may negatively impact the Company's reputation, operations, or stakeholders.

1.2. The Company is committed to maintaining the highest standards of ethical conduct and corporate governance. This Policy aims to foster a culture of openness, integrity, and accountability within the organization.

### **2. Scope**

2.1. This Policy applies to all employees, officers, directors, contractors, vendors, customers, and stakeholders associated with the Company.

2.2. It covers concerns related to, but not limited to, **financial misconduct, accounting irregularities, bribery, fraud, harassment, discrimination, violation of laws and regulations, and any other unethical or illegal activity within the Company.**

### **3. Reporting Mechanisms**

3.1. Employees and stakeholders are encouraged to report concerns under this Policy using the following mechanisms:

a) **Direct Reporting:** Concerns may be reported directly to the designated Whistleblower Officer or a senior manager within the Company.

b) **Anonymous Reporting:** The Company has established a confidential and secure whistleblowing channel, which allows individuals to report concerns anonymously. This channel is maintained by a third-party service provider to protect the identity of the whistleblower.

### **4. Protection of Whistleblowers**

4.1. The Company is committed to protecting the identity of whistleblowers to the maximum extent permitted by law. Whistleblowers can make anonymous reports, and every effort will be made to keep their identity confidential.

4.2. Retaliation against whistleblowers is strictly prohibited. Any form of retaliation or adverse action taken against a whistleblower will be treated as a serious offense and may result in disciplinary action, including termination of employment or legal action.

### **5. Investigation Process**

5.1. All reports received under this Policy will be promptly and thoroughly investigated by a designated investigation committee, which will consist of impartial and qualified individuals.

5.2. The investigation committee will document the findings, and appropriate action will be taken in accordance with applicable laws, regulations, and Company policies.

### **6. Confidentiality**

6.1. All information related to the whistleblower's identity, the report, and the investigation will be treated as confidential, except as required by law.



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## **7. Communication**

7.1. The Company will provide regular updates to the whistleblower, as far as possible, on the progress and outcome of the investigation.

## **8. Non-Malicious Reporting**

8.1. Whistleblowers are expected to make reports in good faith. Reports made with malicious intent or false information may result in disciplinary action.

## **9. Review and Revision**

9.1. This Policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations. Any necessary revisions will be made to enhance its functionality.

## **10. Contact Information**

10.1. Whistleblowers may contact the designated Whistleblower Officer at [Contact Information] for any queries or concerns related to this Policy.