



MBI INTERCORP LIMITED

WHISTLE BLOWER POLICY

Introduction:-

The Whistle Blower policy is for elimination of malpractices in the system. This policy encourages all the employees to come out with their complaints as to any kind of misuse of company's properties, mismanagement or wrongful conduct prevailing in the company, if any.

Scope:-

To formulate and implement a Whistle Blower Policy for safeguarding the interest of the Whistle Blower. A Whistle Blower can report any unethical or improper (not necessarily violation of law) practice or violation of the Company's Code of Conduct or complaints regarding accounting, auditing, internal controls or disclosure practices of the Company. The policy gives a platform to the Whistle Blower to report the above mentioned practices to the Chairperson or the Managing Director and to define processes for receiving and investigating complaints. Although the complaint is not expected to prove the truth of an allegation, the complainant needs to demonstrate that there are sufficient grounds for concern and is not done as a malicious act against an individual.

Applicability:-

This policy applies to all employees and Directors of the Company including Consultants, Project trainees, other trainees, contractual staff etc.

Purpose:-

1. To encourage the employees to report to the management about suspected unethical behaviors, malpractices, wrongful conduct, fraud violation of the company's policy including code of ethics and conduct violation of law or questionable accounting or auditing matters by any employees/ director in the company without any fear of retaliation.
2. To build and strengthen a culture of transparency and trust in the organization.
3. To disclosure of alleged wrongful conduct to the team members of the whistle blower policy.



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Framework Guidelines for Employees:-

In case of any suspected violation of any law that applies to the FFSL and any suspected violation of the FFSL's Code of Conduct, an Employee or Director may report the same in the manner mentioned in this Policy. Such violations include, but are not limited to, accounting or financial reporting violations, fraud, misappropriation of money, discrimination or harassment based on gender, race, religion, language, etc., unlawful manipulations, insider trading, bribery, or violations of the anti-retaliation aspects of this Policy. Retaliation includes adverse actions, harassment, or discrimination in employment relating to a report of a suspected violation.

Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action.

Amendment:-

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.