

Whistle Blower Policy

HDFC Sales Private Limited

Whistle Blower Policy

HDFC Sales Private Limited (HDFC Sales) believes in maintaining highest standards of professionalism, integrity and ethics. The employees are expected to demonstrate transparency and fairness while conducting all business operations.

Employees with questions or concerns about discrimination and unfair practices at the workplace are encouraged to bring these issues to the attention of their immediate manager but should the resolution not be acceptable, you may escalate the same to the Regional Manager / Head HR / Department Head / Chief Executive Officer (CEO).

HDFC Sales believes in “Open Door Policy” encouraging employees to report unfair practices to Management without fear of reprisal. Therefore, a “Whistle Blower Policy” is formulated with effect from May 15, 2020 to report any misconduct in the organization. This Policy has been approved by the Board of Directors of HDFC Sales at its meeting held on May 14, 2020. The sole aim of this policy is to remain approachable to employees and vigilant at all times.

This policy is an extension of Code of Conduct which lays down principle and standards that governs the action of HDFC Sales and its employees. Any violation of Code of Conduct is considered as misconduct and strict disciplinary action is taken against the employee, as is deemed appropriate.

1. Purpose

To ensure that any employee or stakeholder can report any malpractice, fraud, violation of Code of Conduct, leakage of confidential data, breach of any policy, abuse of power and authority or any other unethical act for personal gain or to cause damage to reputation of organization or its stakeholders.

2. Scope

This policy is applicable to all employees, directors, lenders, key partners, vendors etc. of HDFC Sales Private Limited (hereinafter collectively referred to as ‘stakeholders’). Whistleblowers role is to report any unethical activity with adequate information and not to conduct investigation on their own. Whistleblower shall not participate in the investigation activity unless directed by the Management.

3. Definitions

- “**Accused Employee**” means an employee against whom the complaint is lodged.
- “**Whistleblower**” / “**Complainant**” means a stakeholder, who has raised a complaint with respect to concerns and grievances mentioned in Purpose.

4. Procedure of lodging a complaint

Any stakeholder can raise a complaint to the Management (refer table 1) or Regional Manager/ Department Head/ Head HR or “Whistleblower Complaints Committee” (refer table 2) in writing to report any unethical practices.

5. Access to Management/ Whistle Blower Complaints Committee

A whistleblower can raise their concern directly to the Management. Contact details of Management are given hereunder:

Table 1:

Name	Designation	Landline Number	Mobile Number	E-mail Id
Mr. Gopalkrishnan Santosh	Chief Executive Officer	022 - 61552402	9820076022	santosh.g.nair@hdfcbank.com

Alternatively, a whistleblower can report their concerns to the “Whistleblower Complaints Committee” (the “Committee”). This Committee has been constituted by HDFC Sales to receive, review, investigate and redress any concern raised to the Committee.

The Committee comprises of the following members:

Table 2:

Name	Designation	Landline Number	Mobile Number	E-mail Id
Mr. Ranjeet Shetty	Chief Operating Officer	022 –61552412	9167825902	ranjeet.shetty@hdfcbank.com
Ms. Shilpi Singh	Head – HR	022 –61552437	9769201189	shilpi.singh4@hdfcbank.com
Mr. Farhanali Borker	National Manager – LMS	022 –61552411	9819033493	farhanali.borker@hdfcbank.com
Ms. Priyanka Malhotra	Deputy General Manager - Credit	022–61552479	9920222028	priyanka.malhotra3@hdfcbank.com
Ms. Jenny Boyle	Head – Legal & Compliance	022- 61552432	7777095398	jenny.boyle@hdfcsales.co.in

6. Redressal Mechanism

6.1. In case the complaint is received by Management

Upon receipt of the complaint, the Management may direct any two or more members of the Committee to initiate investigation. Within **7 days** of receipt of the complaint, the designated member(s) shall respond to the complainant and seek more information and clarifications. The Member(s) may also check willingness of Whistleblower to reveal his/her identity to make the communication process direct, smooth and less time consuming. Depending on the complainant agreeing to disclose his/her identity, the Committee Member(s) can meet the complainant to further the investigation.

In case the complaint is against the Management, he/she shall excuse himself/herself from the investigation and further actions as may be required to be taken by the committee with regard to such a complaint.

6.2. In case the complaint is received by the “Whistleblower Complaints Committee” or Regional Manager/ Department Head/ Head HR

The complaint received by the Regional Manager/ Department Head/ Head HR and Committee should be brought to the notice of Management by the person to whom the complaint has been addressed. Upon receipt of the complaint, the Management may direct any two or more members of the committee to initiate investigation with or without the first receipt of the complaint. The Members shall initiate the investigation and respond to the complainant within 7 days of receipt of complaint as mentioned in 6.1.

In case the complaint is against any member of the committee, he/she shall excuse himself/herself from the investigation and further actions as may be required to be taken by the committee with regard to such a complaint.

6.3. The Committee shall investigate with diligence and provide the complainant and the employee against whom the complaint has been raised equal and reasonable opportunity to present their case. The Committee shall be within its sole legitimate power to appoint any person / persons from within the organization or outside the organization, as the case may be, for the purpose of the investigation, after having considered the confidentiality and conflict aspects. The Committee shall complete investigation within 4 weeks of receipt of complaint in both the scenarios mentioned above in 6.1 and 6.2, unless faced with unexceptional circumstances.

6.4. The details of investigation along with all relevant documents and information should be retained by the Committee. The Committee will submit the recommendation to the Management for appropriate action within 7 days from the completion of investigation.

6.5. Action taken against accused employee will depend upon the seriousness of the offense and may include termination of services or any appropriate action as decided by the Management.

6.6. In order to ensure that this policy is not misused by the complainant; any false or frivolous complaint raised with malafide intention will be viewed seriously by HDFC Sales and appropriate disciplinary action will be taken against the Complainant.

7. Protection for the Whistle Blower

7.1. HDFC Sales will not disclose identity of the whistleblower without his/her consent in writing.

7.2. The whistleblower shall be protected against any detrimental action against him/her including harassment of any kind, victimization, threat, biased behavior or any unfair employment practices as a result of complaint raised in good faith.

8. Reporting

The Committee shall submit the number of complaints received, redressed and pending to the Audit Committee on a half-yearly basis.

9. Retention of Documents

All relevant disclosures in writing, documents and findings of the investigation will be retained by HDFC Sales for its record and future reference.

10. Amendment

HDFC Sales reserves the right to amend and modify this policy in whole or in part, at any time without assigning any reason whatsoever. This policy and any subsequent amendments thereof shall be communicated to all concerned within 7 days of its approval by the Board.
