



TALENT 500

WHISTLEBLOWER POLICY

For any assistance:
hrsupport@talent500.co

Version 1- August 24, 2020
Approved by the Board of Directors of the Company on July
27, 2020

Version 2- September 28, 2024
Approved by the Company on September 28, 2024

***Confidential- Internal consumption**

1. Objective

The objective of this policy is to provide the employees of Talent500 (the “Company”), customers and suppliers an avenue to raise concerns, in line with the commitment of the Company to the highest standards of ethical, moral and legal business conduct and its commitment to open communications. This policy provides necessary safeguards for the protection of employees, customers and suppliers from reprisals or victimization, for whistleblowing in good faith. The Company encourages all its employees, customers and suppliers to communicate and raise any behavior or practice, they may be aware of and suspect to be unethical, illegal or otherwise inappropriate and harmful to the company. The Company Whistleblower Policy is a critical means through which employees, customers and suppliers can raise actual or suspected violations.

2. Scope

Everyone is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company’s code of conduct and ethics. It is important that you report all suspected or possible violations, some of which are listed below. It is the policy of the Company that you must, when you reasonably suspect that a violation of an applicable law or the Company's code of conduct and ethics has occurred or is occurring, report that potential violation. Reporting is crucial for early detection, proper investigation and remediation, and deterrence of violations of Company policies or applicable laws. You should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy. 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, including possible termination of employment.

3. Whistleblower Complaint

A whistleblower is an employee, customer or supplier who raises a concern about any wrongdoing, event or information about an actual, suspected or anticipated reportable matter. The whistleblower is not expected to prove the truth of the allegation; but s/he needs to demonstrate sufficient grounds for concern and good faith.

The general malpractices will include amongst others:

- Any fraud or attempted fraud.
- Any behaviour or situation in contravention of the code of conduct and ethics
- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records
- Pilferation of confidential/propriety information
- Deliberate violation of law/regulation
- Wastage/misappropriation of company funds/assets
- Breach of Company policies or failure to implement or comply with any approved Company policies.
- More broadly, any serious violation of applicable laws or regulations

The Company prohibits and discourages retribution against anyone for raising or for helping to address integrity concerns. Complainants shall not be disadvantaged in any manner for having raised a concern. Allegations of retaliation will be investigated and if proven, appropriate action will be taken.

While it is the discretion of the whistleblower to decide to raise an issue anonymously, for the matter to be investigated, the whistleblower should disclose his/ her identity along with the details of the complaint. While the anonymous complaints will also be suitably looked into, it will provide more leverage and will be pertinent to investigate the complaint sufficiently if the whistleblower chooses to disclose his /her identity. The identity of the whistleblower shall be kept confidential to the maximum reasonable extent.

Malicious and baseless allegations may result in disciplinary action and could include even termination and/ or other appropriate action, as the case may be.

4. Investigation

Any such complaint received will be investigated promptly and confidentially, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. If an initial enquiry indicates a necessity of further investigation, then that will be carried out by the concerned person/ team to whom the matter would be directed for investigation. The Company reserves the right to refer any concerns or complaints regarding reportable matters to appropriate external regulatory authorities.

5. Reporting Mechanism

Report your concerns to your manager, Human Resources manager, or you can also write to speakup@ansr.com. The dedicated mailbox will be handled in an independent and unbiased manner. In order to enable the Company to effectively evaluate and investigate the complaint, the complainant must provide all the critical information and a detailed description of the complaint.

The Company would decide whether the complaint qualifies for further investigation under this policy or not. If the decision is that the complaint qualifies for further investigation under the Company Whistleblower Policy, an initial enquiry will be conducted. If the initial enquiry indicates that the concern has no basis, or if the matter is not to be pursued under this policy, it may be dismissed at this stage and the decision will be documented. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

6. 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.