

## **AventIQ, a trademark of Mittal Software Labs Limited**

### **Whistleblower Policy**

#### **Confidential and Restricted**

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### **Objective**

AventIQ, a trademark of Mittal Software Labs Limited is committed to fostering a culture of transparency, accountability, and ethical behavior. This Whistleblower Policy provides a mechanism for employees, contractors, vendors, and stakeholders to report unethical or illegal activities within the organization without fear of retaliation. The policy complies with the Whistleblowers Protection Act, 2014, and other relevant laws applicable in Delhi.

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### **Scope and Applicability**

This policy applies to all:

- Employees (permanent, probationary, and contractual).
- Interns (paid and unpaid).
- Vendors, contractors, and other stakeholders.

It covers reporting of:

1. Fraudulent activities.
  2. Financial irregularities.
  3. Breach of company policies.
  4. Legal and regulatory violations.
  5. Harassment or discrimination.
  6. Health and safety violations.
  7. Any activity that undermines the integrity of AventIQ.
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### **Key Principles**

#### **1. Protection of Whistleblowers:**

- Whistleblowers shall be protected from retaliation, discrimination, or any adverse employment action.

#### **2. Confidentiality:**

- The identity of whistleblowers and the details of their reports will be kept confidential to the extent possible.

### **3. Good Faith Reporting:**

- Reports must be made in good faith with reasonable belief in their accuracy.
- Malicious or knowingly false complaints will be treated as misconduct and may result in disciplinary action.

### **4. Non-Retaliation:**

- Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action, including termination.
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## **Reporting Mechanism**

### **1. Reporting Channels:**

- Whistleblowers may report concerns via:
  - Email: hr@aventiq.ai
  - Hotline: 8595653061, 1144756172
  - Written complaints submitted to the Whistleblower Officer.

### **2. Whistleblower Officer:**

- The Whistleblower Officer shall be responsible for receiving, acknowledging, and investigating complaints.
- Contact Information:
  - Name: Akhil Mittal
  - Email: akhil.mittal@aventiq.ai
  - Hotline: 9999901385, 1144756172

### **3. Anonymous Reporting:**

- Whistleblowers may choose to remain anonymous; however, providing contact information is encouraged for follow-up and resolution.
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## **Investigation Process**

**1. Acknowledgment:**

- Complaints will be acknowledged within 5 working days.

**2. Preliminary Review:**

- The Whistleblower Officer will conduct a preliminary review to determine the validity and scope of the complaint within 10 working days.

**3. Detailed Investigation:**

- A detailed investigation will be initiated for valid complaints, led by an impartial team or external experts if necessary.
- The investigation will be completed within 30 working days unless an extension is required.

**4. Outcome and Actions:**

- Findings and recommendations will be submitted to senior management.
- Appropriate corrective actions, including disciplinary measures, will be implemented as necessary.

**5. Communication with Whistleblower:**

- Whistleblowers will be informed of the outcome of their complaints, subject to confidentiality obligations.

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**Confidentiality and Record Keeping**

1. All complaints, investigation reports, and related documents will be stored securely.
  2. Records will be retained for a minimum of five years or as required by law.
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**Responsibilities**

**1. Whistleblower Officer:**

- Ensure prompt acknowledgment and investigation of complaints.
- Maintain confidentiality and impartiality during investigations.

**2. Employees and Stakeholders:**

- Report unethical or illegal activities promptly.
- Cooperate fully during investigations.

### **3. Senior Management:**

- Ensure that the policy is implemented effectively.
  - Act on investigation findings to address concerns and prevent recurrence.
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### **Training and Awareness**

1. All employees will receive training on the Whistleblower Policy during onboarding.
  2. Refresher sessions and awareness programs will be conducted periodically.
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### **Policy Review and Amendments**

This policy will be reviewed annually and updated to reflect legal or organizational changes. Any significant amendments will be communicated to all employees and stakeholders.

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**Approved By: Nikhil Mittal**

**Effective Date: 01-Jan-2025**

**Last Updated: 26-Dec-2024**