

THE WHISTLE BLOWER POLICY

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. OnMobile Global Limited and all its subsidiaries and affiliated entities (hereinafter collectively referred to as '**OnMobile**' or '**the Company**') are committed to lawful and ethical behavior in its everyday activities. The aims of this policy are:

- a. To encourage reporting of suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- b. To provide stakeholders with guidance as to how to raise those concerns.
- c. To reassure stakeholders that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy should be read and applied in conjunction with the Company's Code of Business Conduct and Ethics and the Anti - Bribery Policy.

Applicability: The policy is applicable to:

1. All employees of the Company and its subsidiaries (including the Board of Directors);
2. Agents and vendors;
3. Venture partners, business partners, customers /clients, associates;
4. Contractors, sub-contractors, interns; or
5. Other third parties.

All the foregoing 1-5 hereinafter collectively referred to as '**stakeholders**'.

Categories of Complaints to be Reported: Stakeholders are free to report any concerns or issues, without fear of retaliation to make known any inappropriate act or conduct, whether actual, potential or suspected. The list is not definitive but is intended to give an indication of the kind of conduct that might be considered as wrongdoing:

1. Any unlawful act whether criminal or a breach of civil law;
2. Failure to comply with any legal or professional obligation or regulatory requirements;
3. Breach of trust;
4. Abuse of authority
5. Danger to health and safety;
6. Damage to the environment;
7. Possible or actual breach of the Code of Business Conduct and Ethics or the applicable anti-bribery law;
8. Facilitating tax evasion;
9. Financial fraud or mismanagement;
10. Breach of **ANY** of Company's internal policies and procedures including Code of Business Conduct and Ethics (with the exception of any violation that would fall under the policy for the Prevention of Sexual Harassment at the Workplace, as further detailed below);
11. Conduct likely to damage reputation or financial wellbeing of the Company;
12. Unauthorised disclosure of confidential information;

13. Any other activities whether unethical or fraudulent in nature and injurious to the interests of the Company.
14. Deliberate violation of applicable laws/regulations to the Company, thereby exposing the Company to penalties/ fines;
15. Deliberate concealment of any of the above matters.

A Whistleblower is a person who raises a genuine concern relating to any of the above. Any genuine concerns related to suspected wrongdoing affecting the Company's activities should be reported under this policy.

Special clause on sexual harassment complaints: Complaints about any sexual harassment shall be made to the Internal Committee (IC) constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

The Whistleblower: Whistleblowers are not expected to act on their own in conducting any investigation. Even if stakeholders only suspect misconduct, reporting of the same is essential. The Whistleblower shall co-operate with the actions and procedures conducted by the Whistle Blower Committee on such concerns. Whistleblowers may make their disclosures anonymously and appropriate steps will be taken by Whistleblower Committee in its investigation to ensure the anonymity. While the Whistleblower has a right to be informed about the action initiated on the complaint reported, the Whistle Blower Committee may inform on the outcome of the investigation, to the extent possible.

Reporting and Investigation: If any stakeholder has reason to believe that he/she has become aware of any concern or misconduct of any nature as shared above, he/she must report those facts to their immediate superior or email concerns to whistleblower@onmobile.com (the email will be acknowledged through an auto mailer). Any Whistleblower in case of special circumstance can report the matter to the Chairman of the Audit Committee by sending an email directly to Chairman of the Audit Committee at ChairmanAC@onmobile.com

To maintain the sanctity and secrecy and to serve the purpose of providing the whistleblower mechanism, all complaints lodged through whistleblower@onmobile.com will be accessed only by the Whistleblower Committee, who shall not disclose the identity of the Whistleblower and take necessary steps in such regard. Complaints can also be lodged anonymously by clicking on the below link:

<https://www.onmobile.com/forms/whistleblower/>

The Whistleblower Committee would review and investigate the complaints reported under this whistleblower policy. For all categories of complaint registered under this policy, Whistleblower Committee is authorized to take suitable steps for investigation and on case to case basis may obtain support of external resources / consultants for any investigation. The permanent members of the Whistleblower Committee are as under:

1. Executive Chairman and CEO
2. Chief Financial Officer

Discrimination, Retaliation or Harassment: Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If the Whistleblower believes that he/she has suffered any such treatment, they should inform the Whistleblower Committee immediately. The



Company strictly prohibits any discrimination, retaliation or harassment against any Whistleblower and any individual involved in such conduct shall be subject to disciplinary action.

Treatment against False Complaints: A whistleblower who knowingly makes a false complaint or allegation shall be subject to disciplinary action being a breach of Code of Conduct, up to and including but not limited to penalty, suspension and termination of employment contracts or vendor/procurement contracts or contracts of any other nature and such shall be in adherence with the rules, procedures and policies of the Company, and any non-employee complainant making false complaint will be dealt in accordance with law under provisions of Penal Code. Further, protection under this policy would not mean protection from corrective or disciplinary action arising out of false or bogus allegations made by a whistleblower knowing it to be false or with a mala fide intention.

Additional Enforcement Information: In most cases the whistleblower should not find it necessary to alert anyone externally. However, in addition to the Company's internal complaint procedure, employees and stakeholders should also be aware that certain law enforcement and statutory agencies are authorized to review questionable accounting or auditing matters, or potentially fraudulent reports of financial information, and if the report has been made to the Whistleblower Committee then all other actions should be kept on hold till such matter is pending investigations by the Committee.

Applicability of Local Laws: In instances where local law contradicts the policy, the local law shall take precedence and prevail over this policy.

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