



BLAZECLAN TECHNOLOGIES PVT. LTD.

Whistleblower Policy
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The contents of this document are solely for internal usage of the clanmates.

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A	1 st April 2022	All Sections	Susmita Kaushik	Sanjay Bhat	Varoon Rajani	First Issue
A01	1 st April 2023	Included Vendor/Service Provider(s) in the scope of policy	Susmita Kaushik	Sanjay Bhat	Varoon Rajani	Second Issue

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Policy Statement

This policy guides our organisation, on how to support Clanmate/Vendor/Service Provider(s) and provide support to whistle-blowers who in good faith and without malice, disclose information or raise concerns about alleged improper or illegal activity at Blazeclan Technologies Pvt. Ltd. or any of its subsidiaries.

Blazeclan and our Clanmate/Vendor/Service Provider(s) are committed to providing services in a safe and honest way. We expect everyone to comply with all legal requirements. We will support and respect anyone who acts as a whistle-blower to draw attention to suspected inappropriate, corrupt, or illegal conduct or behaviour.

Scope

This document applies to all clanmates (permanent, interns or contractors) and vendors, service providers at Blazeclan India and Subsidiaries of Blazeclan in Singapore, Malaysia, ANZ, Canada, USA and Belgium.

Roles & Responsibility

Management

To ensure all support towards PEx functions in terms of giving suggestion, modification, and approval to the processes.

People Experience Team

The PEx team is responsible to update this policy as per organization needs. Review this policy from time to time to make relevant changes as and when need arises and get the policy document reviewed and shared with all concerned.

Clanmate

This is responsibility of each clanmate to follow the procedure and guideline mentioned in the policy document.

Whistle-blower

A person who raises concern regarding illegal and/or improper conduct that affects others. The person is not usually involved in the issue but is wanting to alert others to suspected misconduct. The alert may be raised outside of usual reporting lines or processes.

Principles

- Blazeclan encourages clanmates to speak up, to make complaints and raise concerns about service integrity, safety and quality.

- Blazeclan has good governance and responds appropriately to concerns about illegal or inappropriate conduct, whether that's provided as feedback, a complaint or a person acts as a whistle-blower.
- People who 'blow the whistle' are not victimised and will be always treated fairly and with respect
- Blazeclan will not retaliate against whistle-blower including clanmates, for raising an alert about suspected misconduct.

What is Whistle-blower-Policy?

- Where a Clanmate/Vendor/Service Provider(s) has acted as a whistle-blower, the person to whom the disclosure was made will secure any records or information related to the alleged issue.
- Information can be provided in any format or email to hrms@blazeclan.com / call at +91 7378665773. Claims made in conversation should be documented by the person receiving the claim. The record of conversation should be signed by the whistle-blower to verify it is a true account.
- Any information shared about the allegations raised by a whistle-blower will be de-identified to protect the whistle-blower's identity and stored securely while the matter is examined.
- The Concern shall be investigated either by the Whistle-blower Grievance SPOC or through any other person as deemed necessary by the Executive Leadership/Founders of Blazeclan. Should the organisation decide to an internal investigation is required, care must be taken to protect the integrity of any evidence and the usual internal investigation process should be followed.
- Blazeclan will investigate which will be confidential, fair and objective. The Code of Conduct always applies.
- Blazeclan and our Clanmates/Vendor/Service Provider will comply with all legal requests for information in a timely manner. Requests by external parties for information will be responded to using the organisation's complaints, access to information and privacy policies.
- The SPOC overseeing the investigation or working on the issue raised by the whistle-blower will keep the whistle-blower and all other parties informed about the process and the outcome of the investigation where permitted.
- If the matter is investigated by an external organisation or referred to police or another investigating body, there may be limits on what information can be shared. In this case, involved parties will be advised of any limitations on the release of information.
- The Whistle-blower Grievance SPOC must acknowledge the receipt - within 3 working days and close the matter within 30 days.

- Clanmate/Vendor/Service Provider(s) who are impacted will be offered support by Blazeclan.

Related Policies

Underlying our corporate social responsibility program is a set of core policies that outline our approach and guide our activities:

- Code of Conduct
- Equal Employment Opportunity
- Anti-Bribery and Anti-Corruption Policy
- Health and Safety Policy
- Anti-Harassment Guidelines Policy
- Prevention of Sexual Harassment at work Policy
- Modern Slavery Policy
- Corporate Social Responsibility