

## SUB PROCESS DOCUMENT

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Fraud and Whistleblower Policy (Vigilance Mechanism) and  
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### Approval Details

<b><i>Approval Details</i></b>	<b><i>Business / Function</i></b>	<b><i>Risk &amp; Controls</i></b>
Approver designation	Head - Governance, Risk & Compliance	Head - Governance, Risk & Compliance
Approver Name	Kaveri Venkataraman	Kaveri Venkataraman

### Review History

Previous Version No. : 1.2  
Reason for change : Change in email id, approvers and Executive Committee members

## 1.PREFACE

Writer Corporation (called the ‘Company’) through its ‘Code of Conduct’ is committed to the highest standards of moral and ethical behavior. The Company is also committed to have zero tolerance for fraud both inside and outside of the company. The Board of Directors (Board) and the Senior Management of the Company are committed to the maintenance of high standards of ethics, honesty and integrity, and promoting a corporate culture that adheres to these values. With a view to ensure ethical behavior; the Company considers it appropriate to provide a channel to its various stakeholders for informing fearlessly any event of concern to a designated authority in the Company.

Through this policy, Writer Corporation is committed to support and enforce the Fraud and Whistleblower Policy, which will aid in detection and prevention of Fraud. This policy will also ensure honest, open and well-intentioned working environment where people are confident to raise their concerns without fear of reprisal, retaliation, discrimination or any kind of harassment.

## 2.OBJECTIVE

The purpose of this policy is to define:

- Framework for reporting instances of unethical / improper conduct under the definition of Fraud.
- Procedures to report any suspected unethical and /or improper practice under the definition of Fraud
- Procedures for actioning and reporting on such disclosures to the relevant authority within the Company
- Procedures to review disclosures and direct corrective / preventive action relating to such Disclosures
- Responsibilities regarding the prevention, detection and investigation of fraud.

Writer Corporation values integrity of its staff and recognizes that they have a key role to play in the prevention, detection and reporting of fraud. It therefore encourages them

to be vigilant at all times and to report any concerns they may have at the earliest opportunity.

### 3. APPLICABILITY

This policy applies to any irregularity / fraud / fraudulent activity (as defined below) that is detected or suspected, involving:

- Employees.
- Trainees.
- Contract Staff.
- Shareholders.
- Consultants.
- Vendors.
- Service Providers.
- Contractors.
- Outside agencies any other parties with a business relationship with Writer Corporation

### 4. DEFINITION

1. FRAUD: The term ‘fraud’ applies to both internal and external fraud and is used to describe offences such as, but not limited to, deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, and collusion perpetrated for personal profit or to gain some unfair advantage. It further includes and means any of the following:

- Intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury.
- False accounting - dishonestly destroying, defacing, concealing or falsifying any account, record or document required for any accounting purpose
- Knowingly providing false, deceptive, misleading or incomplete information

within business / functions, to its partners, or other business relations, or deliberately failing to provide information where there is an obligation to do so.

- Disclosing confidential, sensitive or proprietary information within or to outside parties
  - Forgery, alteration, destruction or removal of any document or account belonging to the Company
  - Forgery, alteration, destruction or removal of cheque, bank draft, or any other financial document
  - Misappropriation of funds, securities, supplies, or other assets
  - Impropriety in the handling or reporting of money or financial transactions
  - Profiteering as a result of insider knowledge of company activities
  - Accepting or seeking anything of material value from contractors, vendors or persons providing services / materials to the Company. (Exception: Gifts equal to or less than Rs. 2500 in value)
  - Accepting any offering or taking of inducements, gifts or favors which may influence the action of any persons;
  - Misappropriation, or misuse of company's assets including computers, vehicles, machines, mobiles, furniture and fixtures, equipment or any other property or services outside of professional duties or without specific authorization
  - Destruction or removal of company's assets including computers, vehicles, machines, mobiles, furniture and fixtures, equipment or any other property or without specific authorization
  - Any similar or related inappropriate conduct
2. "Audit Committee" means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 292A of the Companies Act, 1956.
  3. "Investigators" mean any person(s) duly appointed / consulted to conduct an investigation under this policy
  4. "Subject" means a person / group of persons against or in relation to whom a complaint / disclosure is made under this policy. It also includes person / group of persons who are the focus of the enquiry / investigation.
  5. "Company" means Writer Corporation Pvt. Ltd and its subsidiaries, associates and joint venture.

6. “Whistle Blower” (WB) means any Employee, ex-employee, trainee, director, contract employee customer or vendor of the Company, making a complaint / Disclosure under this policy
7. “Disclosure” means any complaint or communication in any form (including email, telephone, letter etc) in relation to an unethical practice (including anonymous Disclosures, if any) made in good faith by the Complainant / Whistle Blower to the designated personnel under this policy.

## 5. PREVENTION & DETECTION

The Management of the Company is responsible for the detection and prevention of fraud, misappropriations, and other inappropriate conduct. However, It is the responsibility of:

1. Every business and person of Writer Corporation to develop and maintain effective controls to prevent fraud. They should also ensure an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
2. Each Function Head to ensure that the Company’s ‘Code of Conduct’ and ‘Fraud and Whistleblower Policy’ are well communicated to all staff within their areas of responsibility
3. All employees of the Company to ensure that they are familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity
4. All employees of the Company to report any suspected fraudulent acts in accordance with the ‘Fraud and Whistleblower Policy’ and ‘Code of Conduct’.
5. The Executive Committee to ensure that if any fraud occurs it will be investigated promptly and vigorously, taking appropriate legal and/or disciplinary action in all cases where it would be justified. Further to ensure that any necessary changes to systems and procedures take place immediately to prevent similar frauds from happening again.

## 6. REPORTING

1. Any fraud / fraudulent activity / irregularity that is detected or suspected must be reported by the ‘Complainant’ / Whistleblower (WB), immediately to the Head-



Governance, Risk and Compliance through any of the mode of communications as mentioned below:

- a. Email: An email can be sent at [whistleblower@writercorporation.com](mailto:whistleblower@writercorporation.com)
  - b. The e-mail id shall be accessed by MD - WBS and / or Head- Governance, Risk and Compliance.
  - c. Written Complaint: A written complaint can be dropped by hand delivery or courier at the following address:  

MD - WBS,  
Writer Corporation,  
105, B. Ambedkar Road  
Mumbai- 400 033
2. The Complaint should cover pertinent details about the Fraud covering 'where and when it occurred', 'by whom', 'how it was done', 'other witnesses' and evidences to establish the veracity of the complaint.
  3. Complaint should not be of frivolous in nature. It should not be based on conjecture or hearsay. If known false disclosures / complaints are made then the same shall be subject to disciplinary action as may deem fit by Executive Committee.
  4. It is strongly advised that the complainant / WB disclose his / her identity, as follow up questions and investigations may not be possible unless the source of the information is identified. This will also ensure timely resolution of the issue and adequate protection granted to him / her under the relevant provisions of this policy. The disclosure of the identity is also important to ensure that the complaints are authentic or can be authenticated prior to pursuing any action.
  5. The Complainant / WB will receive acknowledgement on receipt of the complaint and will be informed to:
    - a. Not attempt to personally conduct investigations or interviews / interrogations related to any suspected fraudulent act
    - b. Not contact the suspected individual in an effort to determine facts or demand restitution.
    - c. Not discuss the case, facts, suspicions, or allegations with anyone.
  6. Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by Reporting Managers Branch Managers / State Heads and Manager - Human Resources directly without involvement of Compliance team.
  7. All inquiries concerning the activity under investigation from the suspected individual,

his or her attorney or representative, or any other inquirer should be directed to Head-Governance, Risk and Compliance. No information concerning the status of an investigation will be given out.

In case of any question as to whether an action constitutes fraud, contact the Head-Governance, Risk and Compliance / MD - WBS for guidance.

## 7. PROTECTION

1. The identity of the complainant / WB shall be kept confidential and the protection provided will be provided to the employee / trainee forever.
2. The MD - WBS is the Fraud Protection Officer.
3. The Company, as a policy, strongly condemns any kind of prosecution, discrimination, harassment or any other unfair practice being adopted by any employee / customer / vendor / service provider against the 'Complainant'.
4. No unfair treatment shall be vetted out towards the Complainant by virtue of his/her having reported a fraud under this policy and the Company shall ensure that full protection has been granted to him / her against:
  - Unfair employment practices like retaliation, threat or intimidation of termination/suspension of services, etc;
  - Disciplinary action including transfer, demotion, refusal of promotion, etc;
  - Any kind of prosecution, impeachment or being indicted
  - Direct or indirect abuse of authority to obstruct the Whistle Blowers right to continue performance of his duties/functions during routine daily operations, including making further Disclosures under this policy.
  - No adverse personnel action shall be taken or recommended against an employee in retaliation to his disclosure in good faith of any unethical and improper practices or alleged wrongful conduct. This policy protects such employees from unfair termination and unfair prejudicial employment practices
5. If the Company is informed of the above actions taken by the person against whom the complaint is made; or any employee / customer / vendor / service provider; the Company reserves the right to take appropriate course of action against the said person.
6. The protection is available provided that:
  - The complaint is made in good faith;

- S/he reasonably believes that information, and any allegations contained in it, are substantially true; and
- S/he is not acting for personal gain.

## 8. PROTECTION

1. Head - Governance, Risk and Compliance is primarily responsible for the investigation of all suspected fraudulent acts as defined in the policy and basis the communication received of the suspected fraud / irregularity.
2. Any inquiry / investigation conducted against any Subject shall not be construed by itself as an act of accusation. The investigation would be conducted in a fair manner, as a neutral fact finding process, without presumption of guilt and providing an adequate opportunity for hearing the affected party
3. All Subjects shall be duly informed about the complaints of unethical practice(s) made against them at the commencement of the formal inquiry/ investigation process and shall have regular opportunities for providing explanations during the course of the inquiry/ investigation process
4. Confidentiality of the information and the person suspected as fraudulent, should be ensured by the Head - Governance, Risk and Compliance and all the members of the Executive Committee  
(e) If initial enquiries indicate that the Complaint has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision shall be documented
5. If the preliminary enquiry / investigation substantiates that fraudulent activities have occurred, the Head - Governance, Risk and Compliance will submit a 'WB report' to the Executive Committee for their consideration.
6. The Executive Committee will review the findings of the Investigation and will direct appropriate corrective / preventive action where it feels that there is a reason to believe there is a fraud
7. The Executive Committee will be responsible for ensuring that the investigation process is fair and transparent
8. The decision of the Executive Committee comprising of all or any of (mandatory members) shall be binding and final:
  - Head - Governance, Risk and Compliance (mandatory)



- Chief People Officer; (mandatory)
  - Group, Chief Financial Officer (Optional)
  - Managing Director of the Company (To be informed)
9. The investigation may be conducted by an authority / member of the Executive Committee or by a person / authority who is authorized by the Executive Committee.
  10. The investigation would be conducted in a fair manner, as a neutral fact-finding process, without presumption of guilt and providing an adequate opportunity for hearing the affected party.
  11. The Investigators shall have
    - Right to call for and examine any information / document of the Company
    - Unrestricted access to all Company records and premises, whether owned or rented; and without prior knowledge or consent of any individual who might use or have custody of any such items or facilities, as may be deemed necessary for the purpose of conducting inquiry / investigation under this policy.
  12. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability.
  13. Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made by Managing Director of the Company in conjunction with Legal counsel and Chairman of the Audit Committee.
  14. The Audit Committee Chairman is duly authorized by the Board of Directors to investigate / oversee any cases of frauds / suspected frauds reported / detected under this policy.
  15. The WB report and the documents obtained during the course of inquiry/ investigation, along with the results of investigation relating thereto, shall be retained by the Company for a minimum period of 4 years.
  16. The Whistle Blower upon conclusion of the investigation may be rewarded a reward of 10% of recovered amount subject to a maximum of Rs. 50,000, taxes as applicable shall apply at the prevailing rates.

## 9. CONCLUSION

1. Head-Governance, Risk and Compliance will submit on a quarterly basis to the Audit Committee, a summary of the fraud cases highlighting the following:
  - The nature of the reported cases under this policy and the proposed action thereon;
  - The status of prior and current period reported fraud cases and the action taken thereon;
  - Results / status of any investigations / enquiries in reference to the fraud cases reported; and
  - Any other matter, as the Audit Committee Chairman may deem fit

## 10. ADMINISTRATION

The Fraud and WB Policy will be hosted on the company's website and Intranet, and a paper copy of this will be made available to any person on demand from any of the offices. The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever, after due consultation with the Executive Committee / Audit Committee.

Head-Governance, Risk and Compliance is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

All Disclosures made by the Whistle Blower or documents obtained during the course of inquiry/ investigation, along with the results of investigation relating thereto, shall be retained by the Company for a minimum period of 4 years.

This policy has been approved by the Audit Committee of the Board.

### Version Control Table:

Version no	Revised Date	Revisions
1.2	11-Jun-21	Policy review



1.3	8-Dec-23	Change in email id, approvers and Executive Committee members
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