



KIFS TRADE CAPITAL PRIVATE LIMITED

Whistleblower (Vigil Mechanism) Policy

1. Purpose

KIFS Trade Capital Private Limited (“the Company”) is committed to conducting its business with integrity, transparency, and in compliance with applicable laws.

This Whistleblower Policy (“Policy”) establishes a mechanism for directors, employees, consultants, vendors, and other stakeholders to report concerns about unethical behavior, actual or suspected fraud, or violation of company policies without fear of retaliation.

2. Scope

This Policy applies to:

- All employees (permanent, temporary, contractual)
- Directors
- Consultants and advisors
- Vendors and service providers
- Any stakeholder associated with the Company

3. Reportable Matters

Whistleblowing may relate to concerns including, but not limited to:

- Fraud, financial irregularities, or accounting manipulation
- Bribery or corruption
- Theft or misuse of company assets
- Harassment, discrimination, or workplace misconduct
- Conflict of interest
- Violation of company policies or code of conduct
- Breach of legal or regulatory requirements
- Health, safety, or environmental risks
- Retaliation against whistleblowers

4. Reporting Mechanism

Concerns may be reported through any of the following channels:

- Email: kifs.roc@gmail.com
- Direct reporting: To the Board of Directors
- Anonymous reporting: Allowed, provided sufficient information is given

Reports should include:

- Description of the incident
- Names of persons involved
- Supporting evidence (if available)
- Date and location of occurrence



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5. Whistleblower Protection

The Company strictly prohibits retaliation against any whistleblower who reports concerns in good faith.

Protection includes:

- No termination, demotion, harassment, or discrimination
- Confidential handling of identity
- Protection even if allegations are not proven, provided they were made in good faith

However, malicious or false allegations may result in disciplinary action.

6. Investigation Process

1. Upon receipt of a complaint, acknowledgment will be provided within [7] working days.
2. The Board of Director will conduct a preliminary review.
3. A detailed investigation will be initiated if required.
4. Appropriate corrective or disciplinary action will be taken based on findings.
5. The whistleblower will be informed of the outcome, subject to confidentiality constraints.

7. Confidentiality

All disclosures will be treated confidentially. Information will be shared strictly on a need-to-know basis to facilitate investigation.

8. False or Malicious Complaints

If a complaint is found to be deliberately false or malicious, disciplinary action may be taken against the complainant.

9. Record Keeping

All complaints and investigation records will be maintained securely for a minimum period of 7 years as per company policy and applicable law.

10. Review of Policy

This Policy will be reviewed annually or as required by changes in law or company structure.

11. Approval and Effective Date

This Whistleblower Policy was approved by the Board of Directors on September 24, 2019 which is to be reviewed by the board at least once every 3 years.

For and on behalf of

KIFS Trade Capital Private Limited

Apeksha Modi

Company Secretary – ACS: 35643