

WHISTLE BLOWER POLICY

BETALA GLOBAL SECURITIES LIMITED

As a reputed company, Betala Global Securities Limited is committed to carry on its business with the high standards of business principles and the policies through accountability, integrity and professionalism. Accordingly, the **WHISTLE BLOWING POLICY** is framed pursuant to Section 177 of the Companies Act, 2013, read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules 2014 and clause 49 of the Listing Agreement.

1. Object of policy:

Whistle Blower Policy is a tool to directors and employees to make protected disclosure of genuine concerns or grievances when they find or aware of any actual or possible violation, misconduct, or act not in the company's interest. The Whistle blower can also report directly to the Chairman of the Audit Committee in exceptional cases.

2. Safeguards

This policy also safeguards the whistle blower against any kind of victimization or harassment and keeps to protect identity of the whistle blower when he/she raises a concern.

3. Wrong compliant

If the whistle blower makes compliant in good faith, which is not confirmed on investigation, no action will be taken against such whistle blower. If a complaint is malicious or annoying, disciplinary action will be taken.

4. Action level

- i. Whistle blower shall make his concerns to the company's whistle officer in good faith. Solid information and accurate documents and papers shall be enclosed if any available.
- ii. Upon receipt of complaint, the whistle officer will send immediately, an acknowledgement of receipt of complaint to the whistle blower.
- iii. The whistle officer shall initiate a preliminary enquiry and may seek further information from the whistle blower. The whistle officer may also resolve by an agreed action without any investigation.
- iv. The whistle officer reserves a right to resolve the complaint in good faith.
- v. The whistle officer shall give a periodic report to the Audit Committee of the Company about the concerns raised under this policy.
- vi. Whistle Blower shall have direct access to the Chairman of the Audit Committee in exceptional cases. In such situation, Audit Committee can seek the assistance of concerned departments appropriately.
- vii. In case of repeated frivolous complaints being filed by a Whistle Blower, the Audit Committee may take suitable action against the concerned Whistle Blower including reprimand.