



# Whistleblower Policy

The Firm's "Whistle Blower" Policy is summarized in this section.



**1. The objective of the Policy:**

The Firm is committed to adhering to the highest standards of ethical, moral, and legal conduct of business operations.

**2. The Whistle Blower policy aims to:**

Provide avenues for employees to raise serious concerns regarding ethical values, probity, and integrity, legal compliance, violation of these policies & procedures, or safety, health, and environment practices.

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Redress any harassment or victimization in the workplace including abuse of authority or gender discrimination.

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Enable management to be informed at an early stage to take corrective action and avoid any complications at a later date.

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Develop a culture of openness, accountability, and total integrity.

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Reassure employees that they would be fully protected from harassment or victimization for whistleblowing in good faith

**3. Scope of the Policy**

The Policy shall cover all Directors (including non-executive Directors) on the Board of the Firm and all full time and part time employees of the Firm including temporary and contract staff ("Covered Persons").

**4. Who can blow the whistle?**

Any Covered Person who has definite and verifiable information about wrongdoing/unfair practices carried out in the Firm and wishes to make a protected disclosure can blow the whistle.

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A Covered Person who desires to raise any concern on any of the issues mentioned above may send an email disclosing his/her concern or complaint to [Independent@QASL.com](mailto:Independent@QASL.com). Subject to the overall supervision of the Board, the Audit Committee of the Firm shall have the authority to investigate complaints so received and to take such actions as it determines to be appropriate.

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The Firm's policy is to provide a means for employees to raise concerns, with the assurance that they will be protected from reprisals for "whistleblowing". Hence, no employee will be penalized in any respect for reporting a violation or suspected violation in good faith, even if after investigation it is determined that no violation has in fact occurred.

**5. Matters covered under the policy:**

The Whistle Blower's role is that of a reporting party with reliable information and it intends to unearth serious concerns that could have a grave impact on the operations and performance of the business of the organization. The concerned



Directors having access to the email id Independent@QASL.com shall place before the Audit Committee of the Board all complaints pertaining to the Firm, action taken, and investigation results. The report to be placed to the Audit Committee may cover areas such as:

- Breach of Firms' Code of Conduct
- Questionable accounting or auditing matters
- Any Firm's matters involving abuse of authority
- Fraud, bribery, or corruption
- Employee Misconduct
- Illegality
- Wastage/ misappropriation of Firm's funds/assets
- Victimization of employees and Directors
- Harassment
- Breach of IT security and data privacy
- Any other unethical conduct.
- Breach of any law, statute, or regulation by the Firm
- Issues related to accounting policies and procedures adopted for any area or item
- Acts resulting in financial loss or loss of reputation
- Misuse of office, suspected/actual fraud, and criminal offenses

Further, the list as mentioned above is indicative in nature and not exhaustive. Sexual harassment complaints are handled in accordance with the Prevention of Sexual Harassment Policy and HR process-related grievances will be referred to Human Resource Department for investigation, resolution, and closure.

## **6. Procedure for investigation**

On receipt of an employee's email on the aforesaid email id, any director or other person authorized by the Audit Committee (Authorised Person):

- Shall look into the nature of the allegation
- Shall look in detail at all the evidence available which may include but is not limited to documents and papers, written submission(s), emails / SMS, etc.
- Shall call the relevant employee against whom the allegation has been made and record his/her explanation
- May also co-opt any other employee for assistance in investigating the allegation/s

## **7. Close-out procedure**

- The Authorised Person shall present to the Audit Committee his report and recommendation based on the information gathered/evidence received and the investigation conducted by him/her.

- If the Audit Committee is not satisfied with the explanation/evidence presented before it, they may request the Authorized Person to collect further information on the matter and present a revised report to the Audit Committee for its review & action.

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- The Audit Committee shall close the complaint;
  - A.** By taking appropriate action against the employee involved in or accused of the alleged violation (concerned employee) after reviewing the initial and/or revised report of the Authorized Person and considering all other relevant information, where the concerned employee has been found to have breached the firm's policies and procedures or otherwise
  
  - B.** By discharging the concerned employee, where after the review of all available reports and records, the Audit Committee is of a view that there is insufficient evidence to prove the allegation against the concerned employee, and no case is made out against the concerned employee.
  
  - C.** By taking such other appropriate action as deemed fit by considering all other relevant information.

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- All whistleblowing cases with details of action taken shall be placed before the Board for information

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- If the findings relate to any integrity issue and/or require dismissal of an employee, copies of such report shall also be circulated to the Board for noting.

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- If the allegation is against any of the Audit Committee members or the Authorized Person, such Audit Committee member or the Authorized Person should not be allowed to take part in the investigation procedure of the Committee and the above procedures will be followed by rest of the Committee members or any other Director or other person authorized by the Audit Committee to conduct and complete the investigation.

## **8. Record Keeping**

The Authorized Person shall maintain a log of allegations made by employees under this policy indicating the nature of the allegation, evidence collected, the decision taken on such allegation, and the rationale for such decision.

## **9. Confidentiality**

- Confidentiality Concern for Whistle Blower Investigations: In specific cases, the Audit Committee through the Authorized Person may constitute a committee or a group of executives with requisite skills/expertise to investigate into the complaint. The committee/group shall submit its report to Authorized Person in a time-bound manner. Investigator will maintain confidentiality about the identity of Whistle Blower. The investigator shall also maintain confidentiality about the

investigation process and about the investigation findings.

- Investigation by external Agencies: External technical and other resources may be drawn upon as necessary to augment the investigation. Audit Committee through Authorised Person, will decide on the appointment of external agencies, depending on the nature of the investigation. In case of appointment of an external agency, Authorised Person will keep Audit Committee informed through quarterly report. The investigating agency, including investigators working for the agency, shall be bound to maintain confidentiality about the identity of the Whistle Blower.

Confidentiality is made an important element of the Whistle Blower Policy and should be ensured at all levels.

**10. Training :**

- All new employees are provided with introductory training and mandatory annual training for all employees would be conducted. Specialty training will be provided to staff members who have special responsibilities with respect to the implementation of said policy.
- The aim is for all the employees to gain awareness of their firm-wide compliance obligations as well as their obligations in relation to local regulatory requirements.
- The Whistleblower Policy is accessible to all employees via the Intranet portal and is forming part of the Firm's compliance manual. It is also available on the Firm's website.

**11. Periodic Review of the policy:**

The Policy will be reviewed annually to ensure that it is in accordance with the current legislation. The Board will provide oversight of the Policy.