
AMBITION SERVICES PRIVATE LIMITED

Name of the Policy	Whistleblower Policy
Policy Owner	Legal & Compliance Department
Policy Custodian	Legal & Compliance Department
Approved by the Board	10th January, 2024



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Whistleblower Policy

Ambition Services Private Limited recognizes the importance of providing all employees with the opportunity to act in good faith. Should they witness any acts which may seriously affect the organisation's operations, reputation, or long-term sustainability. As such, Ambition strongly encourages employees to report incidents where fraud or unethical behaviour is witnessed. When such incidents are reported, Ambition will take all necessary and appropriate measures to ensure that the Whistleblower's identity remains confidential. Ambition's Whistleblower policy is based on the adoption and implementation of Ambition's core values and industry best practices.

Purpose

The purpose of this Whistleblower Policy is to encourage and direct all employees in disclosing any fraud or unethical behavior that may adversely impact Ambition, its clients, employees, partners, board members, investors, or the public at large. This policy is meant to set forth (a) what will constitute an incident requiring reporting (b) the appropriate reporting procedure and (c) the investigative process associated with a decision regarding the incident.

Core Values

To ensure the highest level of good governance, Ambition overall Whistleblower Policy has been determined against the organization's core values. A summary of these values is as follows:

- **Teamwork:** Ambition shall uphold the dignity of fellow employees and respect each other's views and work and thus foster a relationship based on cooperation.
- **Integrity:** Ambition thrives to be an ethical, law-abiding institution. We will say what we do and do what we say. We will never over-promise or mislead our stakeholders.
- **Professionalism:** We ensure the satisfaction of our clients and hence believe in delivering services in a professional manner.
- **Transparency:** We will share all information with stakeholders which are important to them and make effort to disseminate our work to the wider world. Our work and actions will be honest and transparent.
- **Equity:** All people irrespective of race, age, gender, sexual orientation, religion, health and ability status or any other consideration should have equal dignity and opportunities. We do not indulge in discriminatory practices.
- **Empathy:** We will always support our clients with empathy during the challenging times by providing them with solutions and quality services.
- **Responsible Practices:** We are committed to follow responsible practices to ensure that the services provided to our clients are not unethical and deceptive.
- **Accountability:** We believe in accepting the responsibility of our actions and meeting the quality standards and maximizing value for our clients.
- **Resilience:** We are committed to building and administering resilient systems and processes to help us thrive and survive in times of change and uncertainty.

Applicability of this policy

This Whistleblower Policy only applies to serious acts of unethical behavior and/or misconduct. Any employee considering blowing the whistle should ensure that the incident falls within one or more of the following categories which Ambition has defined as warranting a report:

- **Illegal activities:** Violation of Indian laws.
- **Fraud:** Theft or misuse of Ambition funds or assets.
- **Personal endangerment:** Physical and/or mental harassment to any Ambition customer or staff.

- Sexual harassment: Physical act or any sexually suggestive actions or communication to clients or staff.
- Abuse of authority: Significant abuse of authority including, but not limited to, extortion, coercion, bribery, and leaking confidential information.
- Unethical activity or any conduct that may constitute breach of the Company's Code of Conduct or Company Values.
- Any activity that may adversely impact reputation of Ambition, its clients, employees, partners, investors, or the public at large.

It should be noted that grievances related to compensation, work group dynamics, supervisory or management style, work environment, confirmation, promotion, transfers, and disciplinary action by reporting line managers do not fall under the scope of this Whistleblower Policy. These grievances, and those of a similar nature, may be directly reported to line management. However, if this does not yield a satisfactory result the employee may report the incident through Ambition's staff grievance redressal system by emailing at hr@ambiserv.in or by calling the company's **Help Line: 1800-889-5319**.

The Whistleblowers are encouraged to make complaints that have an impact on Company's Brand & reputation, cases of financial irregularities, or people related issues of bias, partiality or discrimination of any kind, abuse, victimization or harassment.

Who is a whistleblower?

Any Employee or Director who discloses or demonstrates evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct or Company Values. This whistleblower has come to the decision to make a disclosure or express a genuine concern /grievance/allegation, after a lot of thought. The whistleblower submitting a protected disclosure found to be true will be appropriately rewarded.

Confidentiality and Protection

Ambition recognizes that confidentiality is the most important factor of any effective whistleblower process. As such, any staff member who discloses a potential incident should be fully confident that their identity will be protected to the best of Ambition's ability from all parties except the Compliance and Investigation Officer. Any individual party to the Whistleblower's identity will be bound by a Confidentiality Agreement and as such will be held responsible for any breaches in confidentiality. Therefore, any reports made under this Whistleblower Policy are fully protected disclosures.

It is Ambition's goal that any Whistleblower will not be subject to prejudice, victimization, or any form of professional bias because of their report. However, should any incidents of victimization occur, Ambition will take every effort to protect the physical and emotional safety of the Whistleblower. The organization will take employment action against any employees who are proven to have ostracized any Whistleblowers.

Should an internal investigation or legal action results from a Whistleblower's protected disclosure, they may be obliged to act as a witness in those proceedings which may cause a break in confidentiality.

Good Faith and Disciplinary Action

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumors. This also means

that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

If a Whistleblower is found guilty of intentionally reporting a false incident, Ambition reserves the right to take suitable disciplinary action against this individual. Should this occur this individual is disqualified from any confidentiality or protection normally extended under this policy.

Similarly, Ambition will take suitable disciplinary action if an employee is found guilty of an incident under the process defined under this policy. Examples of employment action include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotions, denial of benefits, threats, harassment, or denial of compensation as a result of the employee's report of wrongdoing, or any manner of discrimination against an employee.

Procedure for raising a complaint

Employees may report any incidents directly to line management should they feel comfortable. Line management is then expected to follow the same process as detailed below in the role of Compliance Officer. However, when an employee does not deem it appropriate to disclose an incident to their direct supervisor, they may utilize the following process:

The Whistleblower must refer allegations to the designated Compliance Officer as soon as possible after witnessing the incident. Incidents should be reported in writing, however if the employee is unwilling or unable to disclose in writing he/she may verbally disclose the matter. Depending on the nature of their employment within the organization, Ambition's Whistleblowers may report incidents to the following designated Compliance Officers:

- Compliance Officer for field staff:
Name: Vikash Nagar
Email: cs@ambiserv.co.in

- Compliance Officer for head office staff:
Name: Vikash Nagar
Email: cs@ambiserv.co.in

The complaint/allegations/violations shall be reported in the format as per Annexure-I.

Procedure for handling a complaint is as given below:

- Once the incident is disclosed, the compliance officer will first do a preliminary investigation to check whether the complaint seems to be genuine and falls under the purview of whistleblower policy. If complaint is sent with malicious intent, then the company will take appropriate disciplinary action against the whistle blower.
- If complaint does not fall under purview of whistleblower policy, then same would be redirected to the right forum. For eg – If complaint is related to sexual harassment, same will be forwarded to the Internal Complaints Committee and would be dealt as defined under the Policy to Prevent Sexual Harassment at the Workplace, If complaint is related to a personal grievance, e.g. appraisal, promotion etc, it will be forwarded to the relevant head of the department.
- Once established that the case needs investigation, the Compliance Officer should prepare a written summary documenting the particulars of the occurrence as per the Whistleblower's testimony. This summary must include the date, time, location, key players, and details of the incident for review by Chief Executive Officer (CEO). Once the report has been reviewed by the CEO, the CEO holds the right to decide if the whistleblower incident warrants an investigation

, The CEO is expected to employ reasonable professional judgement as outlined in Ambition's code of conduct/ethics when approving an investigation. Under no circumstances, the secretary and investigation team would reveal / disclose the identity of the "accused" to anyone else (including the immediate manager) – other than all those who are required to know about the case.

- If an investigation is approved, the CEO shall appoint a team to investigate the case, with utmost confidentiality. The investigative team can be a pool of internal people specially trained to investigate or can be an external agency specialized to investigate such case and the leader of the investigative team shall be known as Investigation officer. The investigative team members should not be connected in any way to the reported incident. The Investigation team will then be informed of the Whistleblower's identity (via the Compliance Officer) and provided any other confidential documentation necessary to facilitate the investigation.
- The investigation team should work towards ensuring that the investigation is completed by following the laws of the land and principles of natural justice. Once the investigation is complete, the CEO and Compliance Officer shall review the report and make a decision regarding appropriate action. At this time, they should also decide if the Whistleblower will be informed of the reports results.
 - The CEO will report any incidents to the Board of Directors (Audit Committee, if any) on a quarterly basis.
 - In any case where the CEO is suspected as implicated in the incident, the report should be submitted directly to the Board of Directors. If this is the case, the Board of Directors should simply replace the CEO in the above noted process. Reports of this nature may be submitted directly to:

Name: Harsh Shrivastava (Independent Director)

Email: harsh.email@gmail.com

Investigation Procedure

Employees should be aware of the following investigation procedure for whistleblowing incidents:

- The initial investigation phase should be viewed as a neutral fact-finding mission and not as an accusation. The Investigative team should collect all relevant primary data related to the incident. At this juncture the identity of the accused should be kept confidential to the extent possible given the legitimate needs of the law and the investigation itself.
- Upon the completion of fact-finding, the accused employee should be informed of the allegation and ongoing investigation. The Investigation Officer should present the evidence, and the accused should be given a fair opportunity to defend him or herself.
- Once the findings have been presented and independent interviews have been conducted with the accused, the Investigation Officer should prepare a written report and that details the evidence and his/her conclusion. All facts, supporting documents and interview transcripts should be provided. No allegation of wrongdoing shall be upheld unless there is good evidence in support of the allegation.
- The CEO, Compliance Officer and Investigation Officer should review the report and then make a decision regarding the incident employing the organization's Code of Ethics and Code of Conduct – as well as any other legal or regulatory guidelines – as decision criteria. The accused employee has the right to be immediately informed of the outcome of the investigation. If allegations are not sustained, the accused employee should be consulted as to whether public disclosure is in the employee's best interest.
- The investigation shall be completed normally within 45 days of the receipt of the protected disclosure by the Whistleblower.

- During the investigation process, the management will ensure that the name of the whistle blower and the person accused is kept confidential at all times.
- Once the investigation is completed, the company secretary will submit the report of investigation to the Board of Directors and the Board of Directors will then decide on the quantum of punishment to be given. While deciding on this, the Board of directors will consider the following:
 - Severity of the misconduct
 - Impact on the Company (Reputation, Financial / Non – Financial)
 - Past record of the employee
 - Past precedence of treating similar violations
- The punishment shall constitute a minimum of written warning and may lead to withdrawal of last increment/ demotion, withholding promotion, dismissal from service and/ or even prosecution in a court of law.
- If the charges framed on the accused is found to be false after investigation, it is very essential to demonstrate that the employee's dignity is respected. Hence, the Business Head / Unit Head should thank the employee personally for having cooperated in the process. A formal closure letter has to be sent informing that the charges has not been proved during the investigation process and hence he / she is fully exonerated of all the charges.

Management of Disclosures

The management of the protected disclosures, including all paperwork and file maintenance will fall with the Head of Human Resources. In the interest of privacy, these files – both electronic and physical – should not be visible to external sources.

Amendment

Ambition reserves its right to amend or modify this Whistleblower Policy in part or wholly and will be communicated to Ambition employees.

Grievances related to employee dissatisfaction can be directed to the HR Helpdesk at hr@ambiserv.in or call 1800-889-5319. Employees may also refer to FAQs posted on GreytHR for further inquiries.

Annexure-I
Format of Complaint/violation Reporting

To
Company Secretary

Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Please note that multiple issues can be selected

1.	Misappropriation of company assets or resources	
2.	Conflict of interest	
3.	Inappropriate sharing of confidential information	
4.	Financial fraud of any nature	
5.	Financial fraud of any nature	
6.	Non-adherence to safety guidelines	
7.	Inaccurate financial reporting	
8.	Bribery & Corruption	
9.	Other forms of Harassment – Victimization, Bullying, Discrimination etc.	
10.	Social Media Usage	
11.	Misuse of authority	
12.	Environment, health and safety	
13.	Others	

Please provide name, designation and department of the person(s) involved

	Name	Department	Designation
Individual-1			
Individual-2			
Individual-3			
Individual-4			

When did the incident occur? (Please provide tentative date if you do not know the exact date)

Please confirm the location of the incident

How did you find out about this incident?

How long has this been occurring for?

- Less than a month
- 1-6 months
- 6-12 months
- Greater than 12 months

Please provide a detailed description of the incident. To enable your company to act on your complaint, you are requested to provide specific information where possible including names, location, date, time etc. Please note that this field is limited to 5,000 characters.

Do you have any evidence in support of your allegations?

- Yes
- No

Is anyone else aware of this incident?

- Yes
- No

Is there any additional information that would facilitate the investigation of this matter?

- Yes
- No

Have you reported this incident to anyone in the company?

- Yes
- No

Date: _____

Location: _____

Name of the Person reporting : _____

Contact Information (incl email): _____