



VIGIL MECHANISM/WHISTLE BLOWER POLICY

Background:

Validus Wealth Private Limited (the Company), is a private limited company incorporated under the provisions of the Companies Act, 2013 and is registered as a Mutual Fund Distributor with the Association of Mutual Funds in India (AMFI). The Company also provides wealth planning services to High Net worth and Ultra High Net worth families. The Company is also registered as an Authorised Person with Stock Holding Corporation of India Limited who is a SEBI registered Stockbroker and a Trading Member of the National Stock Exchange of India Limited and BSE Ltd.

This Policy is in accordance with the mandate prescribed by Section 177 of the Companies Act, 2013 and the Rules made thereunder which prescribes that (a) every listed company, (b) the Companies which accepts deposits from the public and (c) the Companies which have borrowed money from banks and public financial institutions in excess of Rupees Fifty Crores, is required to establish a Vigil Mechanism/Whistle Blower Policy for the directors and employees to report genuine concerns or grievances about unethical behavior, actual or suspected fraud or violation concerning the Company.

Objective:

The objective is to encourage its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. A Vigil (Whistle Blower) mechanism provides a channel to the employees and Directors to report to the management about unethical behavior, actual or suspected fraud or violation of the Company's policies or legal or regulatory requirements incorrect or misrepresentation of any financial statements and reports, etc.

Applicability:

The Vigil Mechanism Policy is applicable to all Employees and/or Directors of the Company with a purpose to raise concerns about unacceptable, improper, or unethical practices being followed in the organisation, without informing the superior. Individuals will be protected against any adverse action and/or discrimination because of such a reporting, provided it is justified and made in good faith.

Scope:

All Employees and Directors of the Company who are associated with the Company can raise concerns regarding malpractices and events which may negatively impact the Company which include:

- Inaccuracy in maintaining the Company's books of accounts and financial records.
- Financial misappropriation and fraud.
- Procurement fraud.
- Conflict of interest.
- False expense reimbursements.
- Misuse of company assets, resources and/or data.
- Inappropriate sharing of company sensitive/confidential information.
- Insider trading

Validus Wealth Pvt. Ltd.

Registered Office: Shiv Sagar Estate, A-Block, 7th Floor, Dr. Annie Besant Road, Worli, Mumbai 400 018
P +91 22 5094 1000 F +91 22 5094 1199 | CIN U65100MH2016PTC282934



- Violation of human rights. and any other matters or activities on account of which the interest of the Company is affected
- Gross or Willful Negligence causing substantial and specific danger to health, safety, and environment
- An abuse of authority or fraud.

Guidelines:

a. Protection under Policy

The vigil mechanism shall provide for adequate safeguards against victimization of employees and directors or such whistle blower who avail of the vigil mechanism and report their genuine concerns or grievances.

b. Disclosure & Maintenance of Confidentiality

Employees and directors shall report to the COO/Legal & Compliance department through e-mail addressed to validus.whistleblower@validuswealth.com in case of any of the malpractices witnessed. Confidentiality shall be maintained to the greatest extent possible.

c. Frivolous complaints

In case of repeated frivolous/ mala fide complaints being filed by a director or an employee, the COO/Legal & Compliance department may take suitable action against the concerned director or employee including reprimand.

Procedure:

- Any employee or director shall submit a report of the genuine concerns or grievances to the COO/Legal & Compliance department as soon as he/she becomes aware of the same.
- The COO/Legal & Compliance department shall appropriately investigate all grievances received. and if required outline a detailed procedure for an investigation.
- The COO/Legal & Compliance department shall have the right to call for any information/document and examination of any employee or director of the Company or other person(s), as it may deem appropriate for the purpose of conducting investigation under this policy.
- A report shall be prepared after completion of the investigation and shall be submitted to the Management who shall, thereafter, consider the same for decision-making.
- The decision or direction of the Management shall be final and binding.

Review:

This policy shall be reviewed and updated periodically for further changes whenever required.