

Whistle Blower Policy

Introduction:

Mulamoottil Financiers Ltd. is committed to conducting its affairs with fairness and transparency, adhering to the highest standards of professionalism, honesty, integrity, and ethical behaviour. To uphold these principles, the company has formulated the Mulamoottil Code of Conduct ("the Code"). This Whistle Blower Policy ("the Policy") is established in compliance with the provisions of the Companies Act, 2013 and other applicable rules thereunder if any, providing employees with a mechanism to report instances of unethical behaviour, fraud, or violations of the company's code of conduct or ethics policy to the Audit Committee.

Definitions:

- Audit Committee: The committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013, and other applicable rules thereunder if any.
- Employee: Every individual employed by the Company, including directors, whether working in India or abroad.
- Code: The Mulamoottil Code of Conduct.
- Investigators: Persons authorized or appointed by the Audit Committee to investigate Protected Disclosures, including auditors and police.
- Protected Disclosure: Any communication made in good faith disclosing or demonstrating information that may indicate unethical or improper activity.
- Mulamoottil Finance: Also referred to as "the Company," it denotes Mulamoottil Financiers Ltd.
- Subject: A person against or in relation to whom a Protected Disclosure has been made or evidence gathered during an investigation.
- Whistle Blower: An employee making a Protected Disclosure under this Policy.

Scope:

- This Policy is an extension of the Mulamoottil Code of Conduct.
- Whistle Blowers serve as reporting parties with reliable information and are not expected to act as investigators.
- Whistle Blowers should not conduct investigative activities on their own but may cooperate as requested by the Investigator or the Audit Committee.
- Protected Disclosures will be addressed by the Audit Committee.

Eligibility:

All employees of the Company are eligible to make Protected Disclosures under this Policy.

Disqualifications:

- Genuine Whistle Blowers will be protected from unfair treatment, but any abuse of this protection will warrant disciplinary action.
- Whistle Blowers making false or malicious allegations knowingly will face disciplinary action.
- Whistle Blowers making repeated frivolous or baseless allegations in bad faith will be disqualified from reporting further Protected Disclosures under this Policy.

Procedure:

- Protected Disclosures may be addressed to the Chairman of Mulamoottil Financiers LTD at the provided address or email.

“The Chairman
Mulamoottil Financiers LTD
Mulamoottil Building, Market Road
Kozhencherry-689641
info@mulamoottilgroup.com”

- They should preferably be reported in writing for clarity and understanding.
- The Chairman of the Audit Committee will review the disclosure and forward it to the Investigator if deemed appropriate.
- Disclosures should be factual and contain specific information for proper assessment.
- Whistle Blowers may choose to remain anonymous.

Investigation:

- All Protected Disclosures will be thoroughly investigated by the Investigator authorized by the Audit Committee.
- In cases where the Investigator's independence is compromised, the Audit Committee will conduct the investigation.
- The decision to investigate is neutral and not accusatory.
- The identity of the Subject will be kept confidential to the extent possible.
- Subjects will be informed of allegations and provided opportunities to respond.

Protection:

- Whistle Blowers will be protected from unfair treatment, discrimination, or harassment.
- Their identity will be kept confidential to the extent possible under the law.
- Employees assisting in investigations will also be protected.

Investigators:

- Investigators will conduct fact-finding and analysis impartially and ethically.
- They will have access to necessary resources and maintain independence and objectivity.
- Investigations will be launched based on specific and credible information.

Decision:

- If an investigation confirms improper or unethical conduct, the Audit Committee will direct appropriate disciplinary or corrective action.
- Disciplinary actions will adhere to established personnel or staff conduct procedures.

Reporting:

The Investigator will submit regular reports to the Audit Committee on Protected Disclosures and investigation outcomes.

Retention of Documents:

All Protected Disclosures and investigation-related documents will be retained by the Company for a minimum of seven years.

Amendment:

The Company reserves the right to amend or modify this Policy at any time, with proper notification to employees.