

## Frequently Asked Questions

### 1. What is the “Whistleblower Policy” & who is a “Whistleblower”?

The Whistle Blower Policy has been put in place to enable a person who observes any unethical practice or suspects any unethical activities (whether or not a violation of law) or infringement of Company’s Code of Conduct, to approach the Whistleblower Committee without any fear and not necessarily informing their supervisors and without revealing their identity, if they choose to do so.

Whistleblower is a person making a disclosure of any unethical activity that they have observed. Whistleblowers could be employees, contractors, contractors’ employees, trainees, vendors, consultants, agents, distributors or other third parties.

### 2. What are the concerns where a Whistleblower can/cannot make a complaint?

Whistleblower can raise issues to the Whistleblower Committee in respect of the following:

- ✓ All unlawful act whether civil or criminal;
- ✓ Breach of or failure to implement or comply with any Company Policy
- ✓ Knowingly breaching any state/national law, or regulations including in personal capacity;
- ✓ Unprofessional conduct or business practice;
- ✓ Fraudulent or corrupt practices;
- ✓ Dangerous practice(s) likely to cause physical harm/damage to any person/property;
- ✓ Failure to rectify or take reasonable steps to report a matter likely to give rise to significant and avoidable cost or loss to the Company;
- ✓ Abuse of power or authority for any unauthorized or ulterior purpose;
- ✓ Unfair discrimination, coercion, harassment in the course of the employment or provision of services;

List of exclusions:

- ✗ Matters which are trivial or frivolous in nature;
- ✗ Issues raised relating to service matters, example matter relating to employment such as salary, promotion, performance appraisal etc. ;
- ✗ Matters which are pending before court of law, tribunal or any other juridical or statutory authorities.

\*The list is only illustrative and not exhaustive and shall include other acts pertaining to breach of policy/ misappropriation/harassment etc.

**3. How can these concerns be expressed?**

A Whistleblower can report any of the issues covered under this Policy in the following ways:

<u>Email</u>	<u>Raise Your Concern (Online)</u>	<u>Written Complaint</u>	<u>Written Complaint against any member of Whistle Blower Committee</u>
<a href="mailto:whistleblower@sudlife.in">whistleblower@sudlife.in</a>	<a href="http://10.1.6.184/ryc/">http://10.1.6.184/ryc/</a>  (Home page of SUD Life Intranet).	SUD Life Insurance Co. Ltd 11 <sup>th</sup> Floor, Vishwaroop IT Park, Sector 30A, Vashi, Navi Mumbai - 400 703	The Chairman - Audit and Ethics Committee SUD Life Insurance Co. Ltd. 11 <sup>th</sup> Floor, Vishwaroop IT Park, Sector 30A, Vashi, Navi Mumbai - 400 703

**4. Who constitute the Whistle Blower Committee?**

Whistle Blower Committee is constituted by the Audit and Ethics Committee of Board comprising of Managing Director & CEO, Deputy CEO & CFO and one external person of the Company as its members.

**5. What information should I provide when I make my disclosure?**

You should state the facts with as much specific information as possible so that your allegations can be investigated, such as what occurred, who was involved, and dates of occurrence. You should not speculate or draw conclusions, and should be prepared to be questioned by the investigator.

**6. Is there any time period within which complaint has to be filed?**

The allegations should be reported within a period of two years from the date of occurrence. Any complaint/ matter brought to the notice after two years period of the occurrence may be entertained at the discretion of the Whistle Blower Committee, depending on the seriousness of the allegations made and matter disclosed.

**7. Can anonymous complaints be made?**

The Whistle blowers making a protected disclosures under the Policy should reveal their identity. The anonymous complaints or complaints made under pseudonym, in normal scenario would not be investigated unless the disclosures are critical and serious in nature.

**8. Who investigates these concerns?**

Investigation Team which includes those persons appointed, authorized and nominated by the Whistleblower Committee are the ones who would conduct an actual investigation of the concerns raised by the Whistleblower.

**Please also refer to the Whistle Blower Policy for more details.**