

VIS

Credit Rating Company Limited

WHISTLE BLOWER POLICY

OBJECTIVE

The objective of this policy is to foster a culture of integrity, transparency, and accountability at VIS Credit Rating Company Limited. It provides employees and stakeholders with a secure, confidential, and structured mechanism to report genuine concerns regarding malpractice, unethical or illegal conduct, conflicts of interest, or non-compliance with established policies, professional standards, or regulatory requirements.

VIS is committed to achieving and maintaining high standards of professional conduct. Employees are expected to act with honesty, impartiality, and integrity. The Company seeks to create an environment where inappropriate conduct is challenged at all levels, and genuine concerns can be raised without fear of retaliation, victimization, or prejudice.

POLICY SCOPE

This policy applies to all employees, including full time, part time and internees (regardless of length of service).

MATTERS TO BE REPORTED

Employees and stakeholders are encouraged to report concerns related to:

- Acts of discrimination, harassment, or workplace misconduct.
- Malpractice, fraud, corruption, bribery, or blackmail.
- Criminal offenses or activities violating legal or regulatory obligations.
- Acts endangering the health or safety of the Employees.
- Violations of VIS policies, Code of Conduct, or professional standards.
- Conduct potentially harming VIS' reputation, business interests, or stakeholder trust.
- Breach of Regulatory Requirements
- Misappropriation of Company's assets
- Concealment of any of the above.

Concerns should be reported promptly to the Compliance Officer using the Whistleblowing Submission Form provided in Annexure 1. Employees may also seek guidance from their immediate supervisor, who is required to maintain confidentiality and must not discourage escalation of the matter to the Compliance Officer.

HANDLING OF DISCLOSURES

Following procedure will be followed for managing disclosures:

INITIAL ASSESSMENT

- The Compliance Officer will acknowledge receipt and conduct a preliminary review to assess authenticity of the complaint.

- The President & CEO is informed of the disclosure.

INVESTIGATION

- If the concern is credible, the President & CEO will constitute an Investigation Team.
- Investigations will be conducted confidentially, fairly, and within a defined timeframe, typically one month from receipt of the complaint.

RESOLUTION AND ACTION

- Possible outcomes of the investigation may include the allegation being unsubstantiated or, if valid, corrective actions will be implemented to prevent recurrence of such event (s). Appropriate action may include disciplinary measures or referral to external authorities if criminal activity is involved.
- If insufficient evidence exists, the Compliance Officer may handle the matter informally or provide guidance to prevent recurrence.

CONFIDENTIALITY

- The identity of the whistleblower will be kept confidential unless disclosure is legally required or the individual provides explicit consent.
- Details of investigations will be disclosed only to individuals directly involved in the investigative process.

PROTECTION FOR WHISTELBLOWERS

- All disclosures will be treated fairly, promptly, and thoroughly.
- Whistleblowers acting in good faith will be protected from retaliation, victimization, or any adverse impact on their employment.
- Harassment or retaliation against a whistleblower will be treated as gross misconduct and may lead to dismissal of the harasser.
- Protection does not extend to individuals making malicious or knowingly false disclosures.

FALSE DISCLOSURES

- Disclosures must be made in good faith, with a reasonable belief that the information is true and correct.
- Malicious or false reporting is a serious disciplinary offense and may result in dismissal.

APPROVALS

This policy is to be approved by the Board of Directors of VIS Credit Rating Company Limited and has to be reviewed on annual basis by the competent authority and duly approved by the Board.

Policy	Date of Review	Authorized By
Whistle Blower Policy	April 2026	Board of Directors

