



CROWN CONSULTANTS PRIVATE LIMITED

CIN- U74140MH1985PTC035548

Registered/ Corporate Office:

G-6/7, Amit Industrial Estate, Dr. S. S. Rao Road, Near Citi Tower, Parel, Mumbai - 400 012
T 91-22-4069 0701-710 Fax No. 022- 40690777 E info@crownssec.com Website : crownssec.com

Whistle Blower Policy

1. Definitions

The following are the definitions / clarifications for the various terms used in this Policy:

“Company” means Crown Consultants Private Limited

“Employee” means every employee of the Company including the Directors in the employment of the Company.

“Senior Management” means — Board of Directors

“Whistle Blower” means an employee or stakeholder (such as business partners, vendors etc.) who wants to attract management’s attention to information about potentially illegal/unacceptable practices.

2. Introduction

Crown Consultants Private Limited is committed to maintaining ethical standards and ensuring transparency in all its operations. This Whistleblower Policy provides a mechanism for employees, directors, and stakeholders to report concerns about unethical conduct, violations of laws, or financial mismanagement without fear of retaliation. The Company is committed to addressing such concerns promptly and appropriately.

3. Objectives

- Encourage employees and stakeholders to report any unethical, illegal, or improper activities.
- Provide a confidential and secure channel for reporting concerns.
- Ensure that whistleblowers are protected from retaliation.
- Uphold the Company’s commitment to good governance and ethical conduct.



4. Scope

This Policy applies to all employees (permanent, contractual, and temporary), directors, and external stakeholders such as vendors and business partners. Whistleblowers may report concerns relating to:

- Fraud, bribery, or corruption
- Financial irregularities or mismanagement
- Violation of laws or regulations
- Breach of the Company's Code of Conduct
- Workplace harassment or discrimination
- Data Privacy Breaches
- ESG (Environmental, Social, and Governance) Concerns
- Any other unethical behavior that could harm the Company's interests

4. Reporting Mechanism

To be considered under the Whistle Blower Policy ("Policy"), the Whistleblower is encouraged to provide the following information in his complaint: name, contact details and department.

Concerns can be reported through the following channels:

- **Email:** compliance@crownsec.com
- **Written Letter:** Addressed to the Compliance Officer at G-6/7 Amit Industrial Estate Dr.S.S. Rao Road Parel East Mumbai-400012
- **Anonymous Reporting:** Employees may submit concerns anonymously via a sealed envelope marked "Confidential – Whistleblower Report" to the Compliance Officer.

All reports should provide specific details, supporting evidence (if available), and the name of the person(s) involved. Anonymous reports will be considered but may limit the ability to conduct a thorough investigation.

Within a reasonable time of receipt of the concern by the Compliance Officer an acknowledgement shall be sent to the sender of the concern. The Compliance Officer shall escalate serious concerns to the Board of Directors if necessary. The acknowledgement shall confirm receipt of the concern and inform the sender that the concern would be inquired into and appropriately addressed and reported to the senior management. In case



the concern does not fall within the ambit of the Whistle Blower Policy, the sender shall be informed that the concern is being forwarded to the appropriate department/authority for further action, as deemed necessary.

Details of all concerns received under the Policy through any of the above modes shall be updated to the senior management on a quarterly basis. The disclosure will be including but not limited to the Number of Complaints Received, Investigation Status, Deadline for Closure of the Investigation, Reason for Extension in Timeline (If any), Action Taken.

5. Investigation Process

- The Compliance Officer will acknowledge receipt of the complaint.
- The Compliance Officer, in consultation with relevant stakeholders, will determine whether the complaint requires a formal investigation.
- An independent investigation will be conducted to establish the facts.
- Findings will be reported to senior management for appropriate action.
- Inquiry into the concerns shall have a three staged progress wherein, the preliminary review will be completed within 20 days and the full investigation will be concluded within a maximum of 90 days from the date of receipt of the complaint. In complex cases, the timeline may be extended and the extension of such timeline will be notified within the 90 days.
- Once the investigation is completed, the Compliance Officer shall document the resolution and communicate the outcome, where appropriate, to the whistleblower.
- The Compliance Officer shall maintain a record of all whistleblower complaints, actions taken, and resolutions for internal audits.

6. Protection for Whistleblowers

- Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee:
 - a. Discloses the information in good faith
 - b. Believes it to be substantially true
 - c. Does not act maliciously nor makes false allegations and
 - d. Does not seek any personal or financial gain.



- The Company will not tolerate any attempt on the part of anyone to retaliate, apply any sanction or disadvantage or to discriminate against any person who has reported to the Company serious and genuine concern that they may have concerning an apparent wrongdoing.
- Employees facing retaliation may report it to the Compliance Officer or escalate to senior management through an email addressed to — Manoj Shantilal Chandaliya on manoj.chandaliya@crownsec.com
- Any individual found engaging in retaliation will face disciplinary action, which may include warnings, suspension, or termination, depending on the severity of the misconduct

7. Confidentiality

- All reports and identities of whistleblowers will be kept confidential to the extent possible under the law.
- Disclosure of whistleblower identity will only occur if required by legal or regulatory authorities.

8. False Complaints

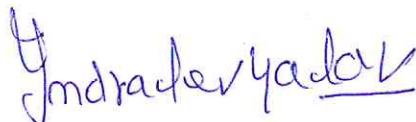
- While the Company encourages genuine reporting, malicious or knowingly false complaints will be subject to disciplinary action, based on a review of evidence and intent.

9. Governance and Review

- The Board of Directors and Compliance Officer will oversee the implementation of this Policy.

This Policy shall be reviewed by the Compliance Officer and approved by the Board of Directors at least once every year or as required by regulatory changes

For Crown Consultants Private Limited



**Indradev Yadav
Compliance Officer**

