

WHISTLE BLOWING POLICY



Version	Prepared/Revised by:	Reviewed by:	Date:	Comments:
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Issued by: India International Insurance Pte Ltd, Compliance Department

Title: Whistle-Blowing Policy

1. Statement of Purpose

Whistle-blowing has an important role to play in uncovering fraud and therefore, Company believes it is necessary to ensure that channels are open for whistleblowing.

The purpose of this policy is to provide a channel to employees, service providers, customers and other stakeholders to report in good faith, in case they observe unethical and improper practices or any other wrongful conduct or improprieties by the management or staff of the company, without fear of retaliation or punishment.

This Policy addresses the commitment of India International Insurance Pte Ltd to integrity and ethical behavior by fostering and maintaining an environment where employees, service providers, customers and other stakeholders can report on any misconduct or improper activities, without fear of retaliation. To maintain these standards, Company encourages its employees, service providers, customers and other stakeholders who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company, to come forward and express these concerns without fear of punishment or unfair treatment. Company assures us that all such reports will be treated with strict confidence and promptly investigated.

2.Responsibility/Owner

Whistle blow Committee: The policy will be administered by Whistle blow Committee and the email address to which reporting of all complaints can be made is whistleblow@iii.com.sg

3. Applicability/Scope

This policy governs the reporting and investigation of improper or illegal activities, as well as the protection offered to the "Whistleblowers". This Policy does not apply to or change the Company's policies and procedures for the following:

- Individual employee grievances or complaints relating to job performance, terms and conditions of employment, which will continue to be administered and reviewed by Human Resources Department.
- Regular complaints addressed to the company by vendors, service providers, customers and other stakeholders

4. Definitions:

4.1. Whistleblower: A person making a disclosure about improper or illegal activities is commonly referred to as a whistleblower. Whistleblowers are employees, service providers, customers and other stakeholders who report in good faith.

4.2. Good Faith: Good faith is evident when a report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true, provided however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

4.3. Misconduct /Improper Activities

Misconduct or improper activities include,

- Impropriety, Corruption, fraud, theft/misuse of III's properties/assets/resources/data
- Conduct which is an offence or breach of law
- Breach of or failure to implement or comply with III's policies.
- Concerns about III's accounting, internal controls or auditing matters
- Serious conflict of interest without disclosure, resulting in material gain
- Abuse of Power or authority (as per Code of Conduct Policy)
- Physical and emotional bullying by colleague (as per Code of Conduct Policy)
- Sexual, gender and racial harassment (as per Code of Conduct Policy)
- Fraud or the making of fraudulent statements to the Board of Directors and regulatory authorities.
- Concealing information about any malpractice or misconduct
- Providing incorrect information intentionally to regulatory authorities

This list is not exhaustive, any matters raised under the Whistleblowing Policy will be considered seriously.

5. Policies

5.1. Report of misconducts

Whistleblowers are encouraged to report in good faith any information they may have on any misconduct or improper activities by any staff, executive or manager. They are allowed access to the Whistle Blow committee. The case may be reported in writing or through an e-mail so as to assure a clear understanding of the issues raised. Anonymous reporting will not be entertained since it is not possible to ascertain if the reporting is made in good faith. The company undertakes to maintain the confidentiality of the whistle blower to the greatest extent possible.

A dedicated email whistleblow@iii.com.sg has been created for the purpose of reporting. The details of the whistle blowing authority, e-mail address and policy are also published on the company website.

5.2. Report in good faith

This policy presumes that employees will act in good faith and will not make false accusation while reporting misconduct. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures, which may include termination.

5.3. Protection to whistleblower

This Policy prohibits the Company to take any adverse personal action against whistleblower for reporting misconduct or improper activities. An employee against whom any adverse personal action has been taken due to his reporting under this policy may approach the Whistle Blow Committee to redress.

5.4. Responsibilities of Whistle-blow Committee

The responsibilities of Whistle-blow Committee include:

- Record all cases reported.
- Review the case and decide whether to proceed with a detailed investigation within a reasonable timeframe.
- Conduct proper investigation of the case and submit the report to Whistle Blow Committee.
- Co-ordinate with external investigator if the case is referred to him.
- Inform the whistleblower about the results of the investigation and the actions taken.
- Submit a quarterly consolidated report to Whistle Blow Committee on the cases reported, findings of the investigation and actions taken.
- Annually, review the policy and recommend enhancements if any.

5.5. External Investigation

In complicated cases, the Whistle Blow Committee may appoint an external party to investigate the case, if it is necessary.

5.6. Management Action

When the Whistle Blow Committee is satisfied that the alleged misconduct or improper activity is proven, he may direct CEO to take such actions as appropriate including any disciplinary action or termination of the staff involved. He may also direct to terminate or suspend any contract or arrangement or transaction initiated by such misconduct or improper activity. Where the case involves CEO, the Whistle blow Committee may recommend to the Board of Directors for appropriate action.

5.7. Communication of the policy

The policy shall be amended from time to time and made available on the website of the company.

Nalini Venugopal

Managing Director & Chief Executive