



WHISTLEBLOWER POLICY

Approved by Board of Directors: March 2, 2026

1. Preamble

This Policy is formulated to provide opportunity for employees to access in good faith, the Executive Committee of the Board of Directors in a case in which they observe unethical and improper practices or any other alleged wrongful conduct within Inclusiv and to prohibit managerial personnel from taking any adverse personnel action against those employees.

2. Applicability

This Policy applies to all current and former employees, as well as current and former independent contractors of Inclusiv .

3. Policy

No adverse personnel action shall be taken or recommended against an employee in retaliation to their disclosure in good faith of any unethical and/or improper practices or alleged wrongful conduct. This Policy protects such employees from unfair termination and unfair prejudicial employment practices.

However, this Policy does not protect an employee from an adverse action which occurs independent of his disclosure of unethical and improper practice or alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this Policy.

4. Definitions

a. Adverse Personnel Action

An employment related act or decision or a failure to take appropriate action by managerial personnel which may affect the employee's current or prospective employment, including but not limited to compensation, promotion, job location, job profile, immunities, leaves, training rights or other privileges. Adverse personnel action also includes reporting to a government body regarding the suspected citizenship or immigration status of an employee or an employee's household or family members.

b. Alleged Wrongful Conduct

Alleged wrongful conduct shall mean violation of law, infringement of Inclusiv's Employee Handbook or ethics policies, mismanagement, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority.

c. Executive Committee

Executive Committee shall mean a committee of Board of Directors of Inclusiv.

d. Inklusiv

Inklusiv and its subsidiaries and affiliates.

e. Designated Officer

Designated Officer means the Board Secretary of Inklusiv.

f. Good Faith

An employee shall be deemed to be communicating in 'good faith' if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct.

Good faith shall be deemed lacking when the employee does not have personal knowledge of a factual basis for the communication or where the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.

g. Managerial Personnel

Managerial personnel shall include executive director, president, executive staff, manager, department head/supervisor or other employee who has authority to make or materially influence significant personnel decisions.

h. Policy or This Policy

Policy or This Policy means "Whistleblower Policy".

i. Unethical & Improper Practices

Unethical and Improper practices shall mean:

- I. An act which does not conform to approved standard of social and professional behavior
- II. An act which leads to unethical business practices
- III. Improper refers to unethical conduct
- IV. A breach of etiquette or morally offensive behavior, etc.

j. Whistleblower

Current and former employees, as well as current and former independent contractors of Inklusiv who disclose in good faith any unethical, improper practice or alleged wrongful conduct to the Executive Committee in writing.

5. Guidelines

a. Internal Policy and Protection under Policy

This Policy is an internal policy with regard to access to the Executive Committee, which comprises qualified directors.

This Policy prohibits Inclusiv from taking any adverse personnel action against its employees for disclosing in good faith any unethical and improper practices or alleged wrongful conduct to the Executive Committee. Any employee against whom any adverse personnel action has been taken due to disclosure of information under this Policy may approach the Executive Committee or in exceptional cases, the Board of Directors for appropriate relief.

b. False Allegation and Legitimate Employment Action

An employee who knowingly makes false allegations of unethical and improper practices or alleged wrongful conduct to the Executive Committee shall be subject to disciplinary action, up to and including termination of employment, in accordance with Federation rules, policies and procedures. Further, this Policy may not be used as a defense by an employee against whom an adverse personnel action has been taken independent of any disclosure of information by him and for legitimate reasons or cause under Federation rules and policies.

c. Disclosure and Maintenance of Confidentiality

An employee who observes any unethical and improper practices or alleged wrongful conduct in Inclusiv may report the same to Executive Committee. The confidentiality of whistleblower shall be maintained to the greatest extent possible.

d. Procedures

Any employee who observes any unethical and improper practices or alleged wrongful conduct shall make a disclosure to the Executive Committee as soon as possible but not later than 45 consecutive calendar days after becoming aware of the same.

If the employee is unwilling or unable to put an oral disclosure in writing, he may approach the Designated Officer directly or through his superior or any other employee. The Designate Officer shall prepare a written summary of the employee's disclosure and provide a copy to the employee.

The Executive Committee shall appropriately and expeditiously investigate all whistleblower reports received. In this regard, Executive Committee, if the circumstances so suggest, may appoint a senior officer or a committee of managerial personnel to investigate into the matter.

The Executive Committee shall have right to outline detailed procedures for an investigation. Where the Executive Committee has designated a senior officer or a committee of managerial personnel for investigation, they shall be required to adhere to procedure outlined by Executive Committee for investigation.

The Executive Committee or senior officer or committee of managerial personnel, as the case may be, shall have right to call for any information / document and examination of any employee of the Federation or other person(s), as they may deem appropriate for the purpose of conducting an investigation under this Policy.

Any individual who is the subject of a whistleblower complaint shall not be present for or participate in deliberations or voting of the Executive Committee relating to the complaint. The Executive Committee may, however, request that the individual provide information, background, or answer questions prior to the commencement of deliberations or voting.

A report shall be prepared after completion of an investigation and the Executive Committee shall consider the same.

After considering the report, the Executive Committee shall determine the cause of action and may order remedies which may include:

- Order for an injunction to restrain continuous violation of this Policy.
- Reinstatement of the employee to the same position or to an equivalent position.
- Order for compensation for lost wages, remuneration or any other benefits, etc.

e. Notification

All departmental heads are required to notify and communicate the existence and contents of this Policy to the employees of their department. Every departmental head shall submit a certificate duly signed by him to the Designated Officer that this Policy was communicated to each employee of his/her department. New employees shall be informed about the Policy by the HR department and a statement in this regard should be periodically submitted to the Designated Officer.

This Policy as amended from time to time shall be made available on the Inclusiv website.

f. Annual Affirmation

Inclusiv shall annually affirm that it has not denied any personnel access to the Executive Committee and that it has provided protection to whistleblower from adverse personnel action.

The affirmation shall form part of Corporate Governance portion of the Inclusiv Annual report.