

Vardhaman Capital Pvt.Ltd.

POLICY ON REPORTING UNUSUAL ACTIVITIES

Policy created by	Designated Officer
Policy reviewed by	Technology Committee
Policy reviewed on	31-12-2024
Policy Approved by	Board of Directors
Policy approved on	04-01-2025

Version – 1.0

Purpose

The purpose of this policy is to establish guidelines and procedures for reporting unusual activities at our Company. This policy aims to encourage employees to promptly report any suspicious or irregular activities that could potentially impact the firm's operations, regulatory compliance, or the integrity of financial markets.

Scope

This policy applies to all employees, contractors, third-party vendors, and any other individuals who have knowledge of or suspect unusual activities within the stock brokerage firm.

Definitions

Unusual Activities

Any activity that deviates from the normal or expected behaviour and may indicate potential risks, fraud, or regulatory non-compliance.

Reporting Party

Individuals who witness or have knowledge of unusual activities and are responsible for reporting such activities.

Reporting Process

Identification of Unusual Activities

Employees are encouraged to be vigilant and promptly report any unusual activities they observe or become aware of during the course of their duties.

Reporting Channels

- Unusual activities can be reported through designated reporting channels, including but not limited to:
 - Direct supervisors or managers
 - Compliance department
 - Internal audit
 - Whistle-blower hotline or reporting platform

Anonymous Reporting

To encourage transparency, the firm provides anonymous reporting options, such as a confidential hotline or online reporting system.

Whistle-blower Protection

The firm is committed to protecting whistle-blowers from retaliation and ensuring confidentiality to the extent permitted by law.

Investigation Process

Designated Investigation Team

An investigation team will be designated to assess and investigate reported unusual activities promptly.

Confidentiality

Information related to the reported unusual activities will be treated with the utmost confidentiality during the investigation process.

Communication

Regular updates on the status of investigations will be communicated to the reporting party to the extent possible without compromising the investigation.

Non-Retaliation

The firm strictly prohibits retaliation against any individual who, in good faith, reports unusual activities. Retaliation is a violation of company policy and may result in disciplinary action.

Training and Awareness

Employees will receive training on recognizing and reporting unusual activities as part of their compliance and ethics training.

Compliance and Legal Considerations

Regulatory Compliance

The reporting process will comply with relevant financial regulations and industry standards.

Documentation

Detailed records of reported unusual activities, investigations, and outcomes will be maintained for compliance and audit purposes.

Review and Update

This policy will be reviewed regularly and updated as necessary to address changes in regulations, business processes, and emerging risks.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.

Vardhaman Capital Pvt.Ltd.

CISO

Dated: - 04-01-2025