

RADIANT FINANCIAL SERVICES LIMITED

CIN: L65991WB1991PLC053192

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WHISTLE BLOWER POLICY

1. Objective

This policy is formulated to provide a mechanism to anyone connected with Radiant Financial Services Limited (“the company”) - including an employee of the company, an investor of the company, a vendor (including consultants) and customers- to approach the Audit Committee of the company and disclose unethical and improper practices or any other alleged wrongful conduct in the Company and to prohibit managerial personnel from taking any adverse personnel action against those employees.

2. Applicability

This policy applies to all permanent employees of the Company and stakeholders (including customers, vendors, consultants, temporary and contract staff as well). This policy shall extend to ex-employees upto 90 days after leaving the organization.

3. Scope of Policy

The policy intends to cover information on suspected unethical and improper practices or wrongful conduct, listed below, which anyone connected with the Company, in good faith and believes to exist:

- a) Manipulation of Company data / records stored physically or electronically.
- b) A substantial and specific danger to public health and safety.
- c) An abuse of authority.
- d) Leaking confidential or proprietary information.
- e) Violation of any law or regulations.
- f) Gross wastage or misappropriation of company resources.
- g) Activities violating policies including Code of Conduct.
- h) Forgery or alteration of documents.
- i) Corruption/ Bribery.
- j) Misappropriation of funds and assets.
- k) Financial Statement fraud.

The above list is only illustrative and should not be considered as exhaustive.

4. Procedures

- a. The Compliance Officer shall be entrusted with various functions under this Policy including receipt of disclosures and investigation of matters.
- b. Anyone connected with the Company who observes any unethical and improper practices or alleged wrongful conduct shall make a disclosure to the Compliance Officer in writing as soon as possible but, ideally, not later than 30 consecutive calendar days after becoming aware of the same and shall furnish as much detail and evidence as possible.
- c. A person wishing to raise a concern to the Compliance Officer may do so either verbally or in writing by providing the following information:
 - i. Background
 - ii. History of the fraud
 - iii. Grounds for raising the concern

- iv. Identification of the subject or subjects
- v. Documentary evidence, wherever available.
- d. The Compliance Officer shall appropriately and expeditiously investigate all whistle blower disclosures received.
- e. The Compliance Officer shall have the right to call for any information / document and examination of any employee of the Company or the person (s) as they may deem appropriate for the purpose of conducting investigation.
- f. After completion of investigation, a report shall be prepared by the Compliance Officer and be placed before the Audit Committee for its consideration.
- g. After considering the report, the Audit Committee shall determine the cause of action and may order for remedies which may *inter alia* include:
 - I. Revision of the policies and procedures of the Company to reduce the risk of recurrence.
 - II. Suggestion action against concerned person.

5. Protection

- a) No discrimination, harassment, victimization or, in the case of employees, any other unfair employment practice like retaliation, threat or intimidation or termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like will be adopted against the Compliance Officer.
- b) The identities of whistleblowers and subject shall be kept confidential to the extent possible, subject to the needs of the investigation or law
- c) The Compliance Officer shall investigate the concerns raised and recommend suitable action to the management which may *inter alia* include:
 - I. Reinstatement of the employee to the same position or to an equivalent position.
 - II. Order for compensation for lost wages, remuneration or any other benefits, etc.

6. Allegations

This policy requires an individual to reveal his/her identity to any disclosures they make, to facilitate a proper investigation.

7. Confidentiality

The Company will treat all such disclosures in a sensitive manner and will endeavor to keep the identity of an individual making an allegation confidential. However, the investigation process may inevitably reveal source of the information and the individual making the disclosures may need to provide a statement which cannot be kept confidential if legal proceedings arise.

8. Untrue / Malicious / Vexatious Allegations

Protection under this policy would mean protection from disciplinary action arising out of false or bogus allegations made by a whistleblower knowing it to be false or bogus or with a mala fide intention.

9. Concerns not covered under the Policy

- Career related or other personal grievances are excluded from the policy.
- Any matter already discussed or in the process of being addressed pursuant to disciplinary or other procedures of the Company cannot be addressed under the policy.
- Business and financial decisions taken by management cannot be questioned under the policy.

10. Notification

The Compliance Officer is required to notify and communicate the existence and contents of this policy to the employees. The new employees shall be informed about the policy. The policy shall also be hosted on the website of the Company.

11. Contact Details

The Audit Committee of the Company may be contacted through the Compliance Officer in case of any need.

12. Amendment

This policy may be amended from time to time as decided by the Audit Committee or the Board of Directors of the Company

Date: 25/07/2014