Policy for Whistleblower System

Version 1	
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Policy reviewed by:	Krunal Rahangadale Head of Compliance
Approved by Principal Officer (name & date):	Krunal Rahangadale Head of Compliance Date- 27th May, 2026
Approved by Designated Director- FIU, PMLA (name & date):	Ritesh Patel Whole Time Director Date- 27th May, 2026
Reviewed by CEO	Moon Kuang Kang
Approved by the Board	27th May, 2026
Name of the entity	Sharekhan Limited and its Subsidiaries.

Executive Summary

Mirae Asset Sharekhan is committed to maintain and provide to all its employee, director, suppliers, vendors, service provider and all other applicable stakeholders of ("whistleblower") highest standards of transparency, probity and accountability. Mirae Asset Sharekhan endeavors to develop a culture where it is safe and acceptable for all whistleblower to raise/voice genuine concerns in good faith, and in a responsible as well as effective manner. Through this policy, which has already been adopted by Mirae Asset Sharekhan, would like to enable any of its whistleblowers to raise concerns internally and to disclose information, which the individual believes shows malpractice, serious irregularities, fraud, unethical business conduct, abuse or wrongdoing or violation. The purpose of this policy is to provide a framework to promote responsible vigil mechanism/whistle blowing for Mirae Asset Sharekhan. The Policy protects a whistleblower from discharge or retaliation or discrimination when the whistleblower reports in good faith the existence of any of the aforesaid activity.

Objective:

To ensure the effective operation of internal controls, the Company shall maintain a whistleblower program that enables employees to confidentially report any unlawful or improper conduct by the Company or its personnel. The detailed procedures and safeguards related to this program shall be defined in the relevant internal regulations and guidelines.

Operation of the Whistleblower System and Protection of Whistleblowers

a) The Company shall operate a whistleblower system that allows executives and employees to confidentially report any unlawful, unethical, or improper conduct by the Company or its personnel.
b) The Company shall ensure that whistleblowers are protected from any form of retaliation or disadvantage because of their report Confidentiality of the whistleblower's identity shall be strictly maintained, and the Company shall take appropriate measures to safeguard the whistleblower's interests.
c) If a whistleblower experiences personnel disadvantages due to the report, the Compliance Officer may recommend corrective action, and the Company shall take appropriate steps unless there is a justifiable reason not to do so.
d) Whistleblowers may be eligible for personnel or financial rewards based on the significance and usefulness of the report, unless they decline such recognition.

Scope and Methods of Whistleblowing

1) Executives and employees must report any of the following matters to the Whistleblowing Officer or the CEO without delay:

a. Criminals conduct such as embezzlement, breach of trust, or bribery.
b. Violations of laws, internal regulations, or internal control policies.
c. Fabrication or destruction of accounting records or operational data;
d. Unlawful or improper solicitation, gift-giving, or receiving of benefits;
e. Disputes with customers or acts that may harm customer trust;
f. Instructions from superiors that are unethical or improper;
g. Any act that may damage the Company's integrity or reputation.
h. Financial incidents discovered during duty;
i. Any other acts that may damage the Company's image.

2) Whistleblowers may submit reports anonymously or under their real name. If available, supporting evidence or documentation should be attached.

Processing and Handling of Whistleblowing Reports

a) Upon receipt of a whistleblowing report, the Whistleblowing Officer shall promptly verify the credibility and factual basis of the report.
b) If necessary, the Officer may request assistance from relevant departments or initiate a special audit in cooperation with the Audit or Compliance De partment.
c) The investigating department shall report the findings and any measures taken to the Whistleblowing Officer, who may notify the whistleblower of the outcome if appropriate.

d) All reports and related documents shall be handled with strict confidentiality, and internal procedures for handling whistleblower information shall be established and maintained by the Compliance Department.

Actions and Appeals Regarding Unlawful or Improper Conduct

a. Executives of each department shall regularly review whether their team members comply with applicable laws and the Company's internal control s tandards.
b. If a violation of laws or internal regulations is identified, the Company or the responsible executive shall promptly take necessary measures to prevent recurrence, including improvements to the internal control system, conducting investigations, and requesting disciplinary actions against the relevant employee(s).
c. If the Company imposes disciplinary action on an employee, the employee may submit an appeal in accordance with procedures set forth in the relev ant internal regulations, stating the reason for the objection clearly and attaching supporting documentation.
d. The Company shall conduct a fair and independent review of such appeals and notify the applicant of the outcome.
e. The Compliance Department shall retain all records related to the investigation, actions taken, and the appeal process for the period prescribed by ap plicable laws or regulations.

The whistleblowing channels of MASK:

Telephone	**022-46573810**
E-mail	whistleblowing@sharekhan.com
Postal mail/In per son	Krunal Rahangadale, Head – Compliance, MASK **Address:**1st Floor, Tower 3, Equinox Business Park, LBS Marg, Off BKC, Kurla (West), Mumbai, 400 070, Maharashtra, India

These whistleblowing channels are managed by the company’s Whistleblowing Committee headed by Krunal Rahangadale, Head – Compliance, MASK. The committee also appropriately investigates, effectively addresses each complaint, and updates the whistleblowers about the investigation.

Definition of an Alert

An alert is reporting, without direct financial consideration4 and in good faith, of information about:

i) A crime or an Offence; or

ii) A threat or harm to the public interest; or

iii) A violation or an attempt to conceal a violation of applicable and binding law:

iv) An international norm.

v) A unilateral act of an international organization adopted based on such norm.

vi) A law or a regulation; or

vii) A breach of the Group Code of Conduct.

Types of issues that can be reported:

i)The issues that can be reported via Whistleblowing Channels include, but are not limited to:

ii)Acts of corruption and influence peddling or any other infringement pertaining to probity.

iii)Acts of fraud (e.g. use of erroneous information in the setting up of a credit file or misappropriation of funds). However, frauds or suspicions of fraud identifie d in internal control activities must not be reported in the Whistleblowing Framework, but according to the usual declaration or reporting processes. The same applies to cases of purely external fraud (e.g. bank card fraud, phishing, etc);

iv)Professional behaviors contrary to the provisions relating to “Respect for persons” (e.g. discrimination, harassment, etc.);

v)Infringement of the rules of professional ethics (e.g. conflict of interests);

vi)Infringement of the rules of financial security (e.g. money laundering, terrorist financing, non- compliance with sanctions and embargoes regulations);

vii)Anti-competitive practices (e.g. abuse of dominant position);

viii)Breach of market integrity (e.g. market abuse);
ix) Infringement of the rules for the protection of interests of clients (e.g. charging commissions without informing the client, undue or excessive arbitration in a n account under delegated management, etc
x)Unauthorized communication of confidential information, theft or leakage of data.

Compliance Whistleblowing Referents

Whistle Blower Committee consist of three senior members, Chief Compliance Officer, Chief Risk Officer and Chief Human Resources Officer. Chief Compliance Officer is appointed as a Whistle Blower Redressal Head who shall be responsible for reviewing the complaints and working under the guidance and instruction of Whistleblower Committee. Chief Compliance Officer oversees the general oversight of the Compliance Whistleblowing Channels.

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Each Compliance Whistleblowing Channel, as described in the above section is under the responsibility of a Whistleblowing Referent ("Compliance WB Referent"), who is appointed within Compliance and in-charge of handling the reports received in this Channel, and to transmit to the HR Conduct Referent – "Respect for persons" any reports received in the Compliance Whistleblowing Channel and raising allegations relating to "Respect for persons". The Compliance WB Referent can be a person or a team.

The Compliance WB Referent's name(s) and contact information must be shared with Employees