Ayvens Whistle Blowing Policy

(Ayvens India Pvt. Ltd. and

Ayvens Insurance Services India Pvt. Ltd.)

C1: restricted

CHAPTER 1. NORM'S GENERAL INFORMATION

SECTION 1. OWNERSHIP VALIDATION AND STATUS

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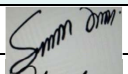
Finance & Legal Director	
Risk & Compliance Director	
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Ayvens India Pvt. Ltd. & Ayvens Insurance Services India Pvt. Ltd.	1.1

SECTION 3. KEY REQUIREMENTS

Requirements

HR organizes the handling of whistleblowing reports containing allegations of inappropriate behaviour or other matters within the scope of its responsibility.

Compliance organizes the handling of non-HR whistleblowing alerts.

The HR and non-HR referents are locally appointed and have the appropriate training.

Governance / Committee:

On a quarterly basis whistleblowing topics are discussed in local COMCO.

Process/procedure/tool:

Every alert is handled within the appropriate timelines (as mentioned in the policy).
Entities with >250 employees shall have a local instance of Whistle Blowing in which non-managerial alerts shall be administered and handled.
Entities ≤250 threshold and managerial alerts for all entities shall be registered locally, adhering to the same standard of data storage, availability, and confidentiality compared to the group policy.
Every alert shall be handled confidential, ensuring protection of the confidentiality of the whistleblower, witnesses, accused persons and others involved.
Employees have received appropriate training and made aware to enable them to fulfil their responsibilities in relation to the above.

Steering, controls & KRI

LOD1 periodically performs control testing of adequate set-up of the whistleblowing framework and handling of whistleblowing cases.
Compliance regularly reports on whistleblowing KRIs (under ABC & Ethics).

CHAPTER 2. PURPOSE AND SCOPE OF APPLICATION

SECTION 1. PURPOSE

Ayvens India Pvt. Ltd. and Ayvens Insurance Services India Pvt. Ltd. (jointly referred as “Ayvens”) are committed to operating with integrity and transparency and complying with the laws and regulations in force in the countries in which it operates. The Société Générale Group Code of Conduct reflects this commitment to act with ethics and integrity. Further with reference to the aforementioned regulation of Sec 177(9) of Companies Act 2013 and the Companies Code of Conduct, Ayvens has established the Whistle Blower mechanism (Vigil Mechanism). An important aspect herein is a mechanism enabling employees to voice concerns in a responsible, effective and safe manner.

The purpose of the Whistleblowing policy is to ensure that there is an internal mechanism in place which allows employees and related externals to report actual or suspicion of misconduct or irregularities within Ayvens. The Whistleblowing policy is structured along with the requirements that apply to the whistleblowing process.

The whistleblowing mechanism is designed to provide a channel for those instances where the reporting person feels that, for any reason, existing complaints and incident management procedures did not or cannot resolve the issue.

SECTION 2. SCOPE OF APPLICATION

The Whistleblowing policy applies to Ayvens Group, including employees, former employees, external and occasional employees (e.g., temporary staff, trainees, service providers, employees of subcontracting companies, etc.), enablers and shareholders. This policy also applies to Ayvens suppliers and other third parties who decided to submit a whistleblowing report on an alleged malpractice involving Ayvens and its employees.

This policy is not designed to reconsider matters which have already been addressed under harassment, complaints, discipline, incident management or other procedures, unless that respective process has not been followed correctly or completely.

CHAPTER 3. STAKEHOLDERS AND GOVERNANCE

SECTION 1. LOD1

Ayvens management must forward whistleblowing reports that are not received via the Whistleblowing system (e.g. emails, letters, transcripts of personal conversations, etc.) to Ayvens Compliance to be included in the Whistleblowing system.

SECTION 2. LOD2

Ayvens Whistleblowing referent oversees the implementation of the whistleblowing system by ensuring the availability of the whistleblowing set-up for Ayvens.

Ayvens Compliance Division ensures that all Ayvens employees, its suppliers and third parties are aware of the whistleblowing system. It ensures the training of all employees as well as the persons in charge of the investigation of whistleblowing reports.

SECTION 3. LOD3

The Internal Audit department is responsible, by performing their control reviews, for ensuring that controls are adhered to and for ascertaining the effectiveness of the corruption prevention and detection measures.

Whenever an investigation conducted by LOD2 or other lines of expertise (e.g., HR, Information Security) is not considered appropriate and/or relevant, the Ayvens Whistleblowing Referent may at its discretion, submit a request to LOD3 for an inspection or audit. Such inspection or audit cannot be refused by the Ayvens Entities.

SECTION 4. EXPERT FUNCTIONS

SUB-SECTION 1. ROLE OF COMPLIANCE & RISK EXPERTS

Ayvens Risk and Compliance experts are responsible for whistleblowing investigations within the scope of their expertise.

SUB-SECTION 2. ROLE OF HUMAN RESOURCE DEPARTMENT

Ayvens Human Resource Department:

- Organizes the handling of reports containing allegations of inappropriate behaviour or other matters within the scope of its responsibility.
- Provides advice on human resource elements in the proceedings of the whistleblowing report
- Seeks the appropriate experts (Compliance, Risk, Legal, etc.), concerning allegations not within their scope of expertise.
- Produces indicators and makes them available to the SG Group Whistleblowing Review Committee and any other committee that needs to know about them within the Group.

Refer to the 'Ayvens Combating Inappropriate Behaviour Policy'.

SUB-SECTION 3. ROLE OF LEGAL DEPARTMENT

The Legal Department:

- assists the Ayvens Compliance in the course of the whistleblowing process;
- is in contact with competent authorities for the purpose of externally submitted whistleblowing reports and other whistleblowing related matters.

Legal experts:

- advise Ayvens Compliance on implementation of applicable laws and regulations within the context of whistleblowing;

- may assist other experts in the processing of whistleblowing reports, in particular in determining the eligibility of such received reports and/or establishing legal facts.
- may provide legal expertise if this is required for whistleblowing investigations;
- assist, when deemed necessary, in finding a lawyer or an independent investigator for whistleblowing investigations.

SUB-SECTION 4. ROLE OF EXTERNAL EXPERTS

Some whistleblowing reports may require the use of external experts for investigation purposes, in case of conflict of interests identified internally, and/or because of insufficient means and/or competence available internally.

SECTION 5. GOVERNANCE

SUB-SECTION 1. COMMITTEES AT SOCIÉTÉ GÉNÉRALE LEVEL

The Whistleblowing Review Committee at SG Group level is held every quarter under the responsibility of the SG Compliance Director. Participants are the Secretary General, the Head of Group Human Resources, the Group Representative of the Culture & Conduct approach and the General Inspector.

SUB-SECTION 2. COMMITTEES AT AYVENS LEVEL

The Whistleblowing Review Committee at Ayvens level is held every quarter under the responsibility of the Ayvens Chief Risk & Compliance Officer (CRCO). Ayvens Regulatory Compliance Division holds the secretary function). Mandatory participants shall be defined in the Whistleblowing Review Committee Charter.

On a quarterly monitoring basis, whistleblowing topics should also be discussed.

SUB-SECTION 3. COMMITTEES AT ENTITIES LEVEL

On a quarterly monitoring basis, whistleblowing topics should be discussed in local COMCO.

CHAPTER 4. PRINCIPLE AND DEFINITIONS

SECTION 1. REGULATORY ENVIRONMENT

As being part of the SG group, Ayvens shall comply with all relevant French and international legal obligations.

In addition, any local law and relevant regulatory requirements that apply to each country in which Ayvens operates, shall prevail. As a result, hereof, requests for derogation from this policy shall be sent to Ayvens Compliance Division.

SECTION 2. DEFINITIONS

Ayvens Whistleblowing Referent:	The Ayvens Whistleblowing Referent (to be referred to as Whistleblowing Referent) is Ayvens Head of Compliance or any Ayvens Head of Compliance delegated person. Delegates are person(s) in charge of handling whistleblowing reports.
Enabler:	Any natural person or non-lucrative entity assisting Whistleblowers to issue their report. The status of Whistleblower may extend to these third-party facilitators, natural persons in relation to the Whistleblower and legal entities controlled by the Whistleblower for which the Whistleblower works or with whom the Whistleblower is associated in a professional context.
Person-concerned:	The natural or legal person who is referred to in the report of potential malpractice and to whom the malpractice is attributed or with whom that person is associated.
Reporting person:	The Reporting Person is the person who reports a malpractice, also to be referred to as Whistleblower.
Whistleblowing report: Whistleblowing report manager:	The Whistleblower is a natural or legal person who submits a whistleblowing report without direct financial expectation and acting in good faith. The Whistleblower can be any Ayvens employee, external and occasional employee, administrator and shareholder as well as any service provider with whom an established commercial relationship is maintained (subcontractors or suppliers). A whistleblowing report must include the following list of types. Please note that if any types are not in scope locally, a deviation request is required: behavior or situation contrary to the Ayvens normative documentation, the Société Générale Group's Code of

Conduct, the Code relating to the fight against corruption and influence peddling and the Group's Tax Code of Conduct, resulting from the actions of one of its employees, representatives or by extension any third party mandated by Société Générale and including the following areas:

- public and private corruption, including influence peddling;
- conflict of interest;
- theft of equipment;
- misappropriation of funds;
- anti-competitive practice;
- violation of international sanctions and other asset freezing measures;
- market integrity: insider trading, price manipulation, dissemination of false information;
- money laundering;
- financing of terrorism;
- accounting fraud;
- tax evasion;
- human resources: discrimination, harassment, health and safety of employees;
- human rights and fundamental freedoms;
- respect the confidentiality of the information;
- protection of personal data;
- Circumvention or Attempt to Circumvent Controls;
- falsification of documents;
- another crime or offence;
- any other violation of or attempt to conceal a violation of international rules that apply to Ayvens entities
- another violation of or attempt to conceal a violation of European Union law or regulation;
- a threat or serious harm to the public interest;

CHAPTER 5. RISK / PROCESS MANAGEMENT FRAMEWORK AND IMPLEMENTATION

SECTION 1. CRITERIA TO QUALIFY FOR A WHISTLEBLOWING REPORT

Only the reports that meet one or more of the criteria below will be taken into account:

- The report is about topics as defined in the definition of whistleblowing report; it does not include complaints and other topics that are not in scope of the definition.
- The report is done in good faith, without direct financial expectation and in factual manner,
- The report is sufficiently detailed and corroborated by any documentary evidence (if available).

SECTION 2. CONFIDENTIALITY

The whistleblowing mechanism, regardless of the reporting channel, guarantees strict confidentiality of the identity of the whistleblower and any person targeted by a report.

All persons who have knowledge of the whistleblowing report and its proceedings are bound to this strict confidentiality. Such persons include all parties that are involved in the proceedings of the whistleblowing report, including those with supervisory obligations as well as internal and external experts.

Information that could lead to identifying the whistleblower may not be disclosed to persons that are not part of the proceedings of the whistleblowing report, unless with the consent of the whistleblower.

However, such data may only be revealed if there is a request from the judicial- or other authority empowered to receive such information. The whistleblower is then informed unless this information compromises the legal process.

Strict confidentiality is ensured by Ayvens throughout the process, in accordance with applicable rules and regulations. Therefore:

- The communication of information relating to a whistleblowing report during its investigation or for control and steering purposes is subject to the strict application of the “need to know” principle.
- The information of the whistleblower and the targeted individuals on the investigations carried out and their follow-up must be formulated in such a way that it does not interfere with the proper conduct of the investigation, does not give rise to a risk of retaliation against the whistleblower and does not refer to the details of any individual measures taken against the targeted individual(s).
- For all reports submitted via the Whistleblowing system and to ensure confidentiality, access to secure messaging is limited to:

- the Whistleblowing Referent and assigned delegates (person(s) in charge of operational whistleblowing reports management);
- persons involved in the processing of the whistleblowing report. Where an opinion not requiring access to the entire report is required, the communications shall be encrypted and shall refer only anonymously to the elements of the report necessary for the formulation of the request.

Communication between the Whistleblowing Referent (or selected experts) and the Whistleblower shall take place via the messaging system within the Whistleblowing system, which ensures protection through encryption.

SECTION 3. ANONYMITY

Ayvens ensures the possibility of submitting an anonymous whistleblowing report.

When the whistleblower decides to submit an anonymous whistleblowing report, Ayvens respects this decision and shall not seek its identity in any way whatsoever.

However, a whistleblower who decides to submit a non-anonymous whistleblowing report may be subject to necessary investigative and security measures.

The identity of the whistleblower may not be disclosed without his/her consent to anyone outside the investigation, except to the judicial or other authority empowered to receive such information. The whistleblower is then informed unless this information compromises the legal process.

SECTION 4. PROTECTION OF THE WHISTLEBLOWER

No one shall be penalized, or be the subject of a discriminatory measure, direct or indirect, in particular as regards remuneration, training, reclassification, assignment, qualification, classification, occupational promotion, transfer or renewal of a contract because it has issued a whistleblowing report in good faith to the competent departments within Ayvens, with the authorities authorized to receive reports or when the facts are disclosed publicly in compliance with the applicable regulations.

This provision applies to whistleblowers, to third parties known as “enablers”, natural persons in relation to the whistleblower and legal entities controlled by the whistleblower for which the whistleblower works or with whom the whistleblower is associated in a professional context. As such, the whistleblower cannot be the subject of retaliation by his direct or functional management line or in any other way for issuing an alert in good faith.

The use of the whistleblowing mechanism in good faith, even if the facts later prove inaccurate, cannot expose the whistleblower to disciplinary action or any other discriminatory measure. The

whistleblower who thinks that (s)he is the subject of such retaliation must report it as soon as possible by submitting a new whistleblowing report.

However, any person who makes abusive use of their whistleblowing right (slanderous denunciation, reporting in bad faith, etc.) will be informed, and can be subject to disciplinary sanctions and, if necessary, legal proceedings. It will not then benefit from the whistleblower's protection.

SECTION 5. MANAGING CONFLICTS OF INTEREST DURING WHISTLEBLOWING HANDLING

A conflict of interest resulting from any situation in which one or more persons having access to the report are directly or indirectly concerned by said report or have a professional or personal relationship with either the whistleblower or the third party ("enablers") or if applicable, or the targeted person(s).

When the report is submitted via the Whistleblowing system, a conflict of interest may involve the Whistleblowing referent or assigned delegates, a member of the Whistleblowing Review Committee, or any other person receiving the report.

The conflicted individual must immediately declare their conflict of interest to the Whistleblowing referent or his/her delegates and refrain from dealing with the report. The whistleblowing report processing measures will then be determined on a case-by-case basis with the Whistleblowing referent or the Whistleblowing Review Committee.

SECTION 6. BREACHES

Any breach or concern regarding a potential breach of this policy or applicable laws must be reported to the LCO and/or Ayvens Group Compliance for their review.

Any breach of this policy will be handled in line with locally established disciplinary procedures and may result in appropriate sanctions. Depending on the nature and the circumstances of the breach, employees may be personally liable for prosecution.

Where a breach resulted in a disciplinary process for the employee(s) involved, a record of that breach shall be maintained by the LCO and/or Ayvens Group Compliance and/or Human Resources.

SECTION 7. POLICY REVIEW AND IMPLEMENTATION

This policy is the subject of an annual review under the responsibility of Ayvens Compliance.

All Ayvens entities are responsible for the transposition of this policy into their local processes and organization.

SECTION 8. PREVENTION SET-UP

Ayvens is committed to providing all its employees with awareness of whistleblowing as deemed necessary to fulfil their legal obligations and comply with the rules set out in this policy.

Ayvens Compliance Department is responsible for setting up appropriate training, awareness-raising and communication programme for all employees, managers and persons in charge of investigating whistleblowing reports.

SUB-SECTION 1. AWARENESS AND COMMUNICATION

The Ayvens whistleblowing mechanism shall be brought to the attention of all Ayvens employees at least once a year by means of periodical communication to all Ayvens employees and annual awareness campaigns, Communication and awareness programs are expected to comply with certain Ayvens rules and guidelines on communication which are still to be specified at the date of publication of this policy.

Ayvens Group Compliance shall inform the Ayvens Group, including Ayvens entities, on updates of the Whistleblowing policy.

SUB-SECTION 2. TRAINING

All employees must undergo yearly training on whistleblowing. This training will be made available by the SG Group. The purpose of this training is to keep employees aware of policies, procedures, their rights to exercise, the means at their disposal, and the protection of a Whistleblower.

Management as well as whistleblowing reports managers must undergo training in managing whistleblowing reports. This training aims to share knowledge on how to manage the entire whistleblowing process. Whistleblowing reports managers should be trained in accordance with the Group's whistleblowing reports management procedure.

The content of the training material must be updated regularly as a result from regulatory updates, risk assessments and any recommendations from regulators and/or internal control.

SECTION 9. MANAGING THE WHISTLEBLOWING PROCESS

Regardless of the channel that is used to submit a whistleblowing report within Ayvens, the process to manage such whistleblowing reports consists of the following steps:

- Acknowledgment of receipt: the reporting person shall receive an acknowledgment of receipt of the whistleblowing report within three working days, informing them that the report has been received, unless it is not possible to contact the reporting person (e.g. due to anonymous reporting).
- Prior evaluation: the content of the received whistleblowing report is examined to determine whether it is eligible for further processing.
- Investigation: the processing of the report may involve one or more experts and must be carried out according to the principles of confidentiality.
- Closure: At the end of the investigation, the Whistleblower is informed of the closure of and follows up on his/her report.

The information obtained in the course of the whistleblowing process will be used by the Ayvens only for the sole purpose of verifying the alleged facts and processing the report.

SUB-SECTION 1. ACCESS TO THE WHISTLEBLOWING SYSTEM

The Whistleblower reports a potential malpractice via the whistleblowing system (https://report.whistleb.com/en/societegenerale) or the locally implemented systems.

In order to facilitate the handling of the report, Whistleblower is invited to transmit, at a minimum, the following information:

- Their identification elements: in particular their name and surname (if the report is not anonymous), their geographical location (country), and their BU/SU/entity (for employees);
- identification of the persons affected by the report / target by the report;
- the subject matter of the reported facts;
- a precise description of the facts being reported;
- documents to support the report where such information is available.
- The identification of the persons to whom the facts were communicated beforehand and/or the references of any other pre-existing report(s).

Employees or external and occasional employees as well as other natural or legal persons who are potential whistleblowers are entitled to request information relating to internal rules, procedures for filing or managing whistleblowing reports, guarantees of confidentiality or any other information relating to the report. They can contact local Ayvens Compliance team directly.

This request for information is not to be considered a whistleblowing report.

SUB-SECTION 2. REPORTING WHISTLEBLOWING CASES

Whistleblowing reports may be submitted through different channels:

- Via the group or local instances of the whistleblowing system. The link to the whistleblowing channels must be easily accessible by employees and all persons requiring access to these channels, including third parties and suppliers.
- To the employee's direct or functional line management or the HR correspondent or, where applicable, the person who is responsible for contracting external hires;
- To the Local Compliance team
- To Ayvens Group Compliance
- To the competent authorities directly or after an internal report, that of which the result was not satisfactory.
- The whistleblower may also decide to publicly disclose the whistleblowing report:
- When, after first having reported internally and externally, no appropriate action was taken;
- When the breach may constitute a serious and imminent danger or a risk of irreversible damage;
- In the case of external reporting, when there is a risk of retaliation or low expectations of the whistleblowing report being effectively addressed;
- in any other case provided for by specific or national legislation or any applicable local regulations or regulatory guidance.

SUB-SECTION 3. HANDLING WHISTLEBLOWING REPORTS

1. RECEIVING AND REGISTRATION OF WHISTLEBLOWING REPORTS

Whistleblowing reports shall be registered and managed in:

- The whistleblowing system (Group or Local instances), when received via this channel
- Local whistleblowing register, when not received via the Whistleblowing system. This method of registration shall be in accordance with all privacy and data protection requirements, while ensuring confidentiality and anonymity.

If the received whistleblowing report is insufficiently accurate or when the facts as described do not enable us to establish whether the report is eligible for further processing, a request for additional information shall be made to the Whistleblower.

Operational incidents identified from whistleblowing reports must be reported as compliance incidents.

2. ACKNOWLEDGEMENT OF RECEIPT

The Whistleblower shall receive an acknowledgement of receipt of the whistleblowing report within three working days after the date of submittance, unless it is not possible to contact the reporting

person (e.g. due to anonymous reporting). The acknowledgement receipt will inform Whistleblower that the report has been received.

The acknowledgement of receipt shall contain at least:

- An estimate of the time required to study the eligibility of the whistleblowing report.
- The manner in which the Whistleblower will be notified of the action taken in the submitted report.
- For whistleblowing reports that are submitted via the whistleblowing system, the acknowledgement of receipt shall include the contact of the data protection officer (DPO), for the purpose of exercising her/his right of access, rectification, erasure of data (except for legitimate reasons of the controller), limitation of the processing relating to the respondent and opposition to the recording of personal data.

3. PRIOR EVALUATION

Each whistleblowing report triggers a preliminary assessment to determine whether it is eligible for further processing. The result of this assessment including reasons shall be forwarded to the Whistleblower within 15 working days after receipt of the whistleblowing report.

In case a period longer than 15 working days is required to define whether the whistleblowing report qualifies for further processing, a message must be sent to the reporting person to justify this new period.

When the report does not fulfil the conditions to be qualified as a whistleblowing report the Whistleblower shall be redirected to the appropriate department or contact person.

Whistleblowing reports managers can also communicate the report to the appropriate departments, for example when the report is a customer complaint.

When the report qualifies as a whistleblowing report the Whistleblower will be informed by the Whistleblowing referent or whistleblowing reports managers that the report is qualified as a whistleblowing report and that investigation will commence. This communication also includes a mention of the possibility for the Whistleblower to submit a new report if (s)he believes that (s)he is the subject to retaliation as a result of this whistleblowing report. Any report on retaliation will be investigated separately from the initial report to ensure independent investigations.

When the report qualifies as a whistleblowing report, Persons-concerned shall be informed of the existence of a report concerning them, provided that this will not interfere with the proper conduct of investigations.

4. HANDLING THE WHISTLEBLOWING REPORT

The Whistleblowing Referent shall determine for each received whistleblowing report, if necessary, assisted by experts, whether it qualifies as a whistleblowing case. All or part of these actions may be delegated to the persons in charge of operational whistleblowing reports management.

Provided that this is in accordance with the privacy rules and would not compromise the protection of the Whistleblower's identity, the person-concerned and other person(s) targeted by the investigation must be informed of:

- For the person concerned only: the allegations that have been submitted,
- the entity where the whistleblowing report was submitted;
- the departments that may receive the report;
- the manner in which they will be notified of the closure of the procedure;
- procedures for exercising their rights of access, rectification and opposition.

5. THE RIGHT TO HAVE ACCESS TO PERSONAL DATA

The Whistleblower, the person concerned, and other person(s) targeted by the investigation may contact the Whistleblowing Referent or the person(s) receiving the report to have access to their personal data, in accordance with applicable regulations.

However, where precautionary measures or instructions are required, in particular to prevent the destruction of evidence relating to the report, the information shall not be shared until such measures have been taken.

They will receive all the necessary information regarding the methods of processing their personal data, in accordance with the regulations relating to the processing of personal data.

6. INVESTIGATIONS

Ayvens or, where applicable, the competent public authorities are empowered to organize investigations and/or to intervene directly to determine the facts of the whistleblowing report.

The Whistleblowing Referent organizes investigations resulting from submitted whistleblowing reports.

Investigations are carried out by internal experts (independent of the persons attached to the departments concerned by the report) or external experts.

A person-oriented Investigation that is deemed necessary in the course of the investigation process shall be conducted after request to and approval of Ayvens Head of Group Compliance. For instance, if during the eligibility determination and/or further inquiry it is discovered that Ayvens employees

were involved in potential misconduct, a formal investigation might be required. If in this formal investigation an Ayvens employee is specifically targeted (e.g., gathering of potential evidence), the Regulatory Compliance Division for further guidance.

Investigations shall be completed as quickly as possible with a maximum of 3 months after the reporting date, without affecting the accuracy, quality and depth hereof. In case the investigation period is provisioned to exceed the 3 months, this must be motivated to Ayvens Head of Group Compliance. The Whistleblower shall be informed of the additional time required to conduct the investigations.

At the end of the investigation phase the person or persons involved in handling the report may propose any appropriate measure, including corrective measures or disciplinary sanctions. Disciplinary sanctions shall be registered in AMIS.

The findings of the investigation shall be forwarded to Whistleblower in writing and within a reasonable period not exceeding three months from receipt of the report.

Where practically feasible, the Whistleblower shall be informed of the measures envisaged to assess the accuracy of their report and of the appropriate measures to remedy the subject matter of said report.

CHAPER 6. STEERING, CONTROLS AND REPORTING FRAMEWORK

SECTION 1. REPORTING

A statistical report on whistleblowing reports should be produced quarterly with the following indicators.

- The total number of whistleblowing reports
- The number of reports containing one or more allegations of corruption
- The number of reports containing one or more allegations of non-compliance with sanctions and embargoes
- The number of reports containing one or more allegations of non-compliance with rules and regulations.

These indicators are sourced from all whistleblowing reporting channels within the Ayvens Group.

Indicators relating to allegations of inappropriate behaviour that are not submitted via the Whistleblowing system shall be delivered by the Human Resources departments of the Ayvens entities.

The Ayvens Human Resource department shall consolidate these indicators. Please see 'Ayvens Combating Inappropriate Behaviour Policy'.

These Whistleblowing indicators shall be presented and commented on to the board of directors as part of the Annual Report on Culture and Conduct and in the Ayvens Group COMCO.

The monitoring of the deployment of the Whistleblowing system is also shared with the Board of Directors during the annual compliance assessment.

SECTION 2. ESCALATION OF HIGH-RISK REPORTS

The Ayvens Whistleblowing Referent shall be informed without delay of any whistleblowing report:

- involving the entity's General Management.
- On facts constituting a criminal offence. (e.g. public and private corruption, influence peddling, market abuse, money laundering or terrorist financing).
- Involving High reputational risk.

The Ayvens Whistleblowing Referent shall forward the reports to Ayvens Regulatory Compliance Division, SG CPLE/REG, and the Ayvens Group Compliance Director for manual integration in the Whistleblowing system.

In case a report, that was submitted via the Whistleblowing system, involves a high criminal or reputational risk, the Whistleblowing Referent informs (1) the Manager of the relevant Ayvens entity, (2) the Business Unit manager, (3) the BU/SU Compliance Supervisor, and (4) Ayvens Regulatory Compliance Division, provided that no conflict of interest is identified for the processing of the whistleblowing report. This action may be delegated to CPLE/REG or to the teams in charge of the investigations.

SECTION 3. CONTROL

There is first level of controls on the monitoring of Whistleblowing in order to verify:

- the proper functioning of the system and
- the correct handling of whistleblowing reports is integrated into the normative control bank and must be carried out according to the procedures defined in it.

SECTION 4. USE OF INFORMATION, RECORDKEEPING

Information obtained through the internal whistleblowing channels must be formulated in an objective and factual manner in line with the scope of this policy. This information will only be used by Ayvens for the sole purpose of verifying the alleged facts and processing the report and its follow-up.

Personal data that is not relevant for the handling of a whistleblowing report shall not be collected or, if accidentally collected, shall be anonymized or deleted within a period of six months after this observation has been made, unless otherwise provided by local legislation or regulation.

In the event of a report not leading to disciplinary or judicial proceedings, personal data must be anonymized or destroyed within one year of the closure of the report unless otherwise provided by local legislation or regulation;

In the event of a report leading to disciplinary proceedings or legal proceedings, the data may be retained, with access limited only to authorized personnel and subject to strict confidentiality, until the end of the procedure and must be destroyed or archived after the time limits for appeal have expired.

In case of retention, it is deemed necessary to meet a legal obligation, the data may be stored with limited access only to authorized personnel and subject to strict confidentiality, until the end of the procedure and must be destroyed or archived after the said term.

The report data is accessible to Ayvens Compliance, the Whistleblowing referent, its delegates and whistleblowing reports managers for the purpose of processing and investigation.

Documentation formalizing the findings of the investigation should not mention the identity of the Whistleblower.

Data that is used as part of the whistleblowing reports shall be anonymized and used as part of the monitoring of the proper functioning of the whistleblowing system and its continuous improvement.

The name of the Whistleblower and the persons concerned may not appear in the results of permanent control.

For questions regarding data processing, the Ayvens Data Protection Officer (DPO) can be contacted to request:

- the exercise of its access, rectification and opposition rights intended for the benefit of potential users of the device;
- the right to access and request rectification and deletion of data if it is inaccurate, incomplete, ambiguous or outdated.

SECTION 5. SECURITY MEASURES

All appropriate precautions must be taken to safeguard the security of the data both in its collection and in its communication or retention:

- Access to the data within the whistleblowing system is done by means of an individual login and password, which are regularly renewed, or by any other means of authentication. These accesses are recorded and controlled regularly in order to know the nature of the information consulted and the identity of the persons who had access to it. Each report issued via the whistleblowing system is recorded in a dedicated restricted access file presenting pseudonymized data and a summary description of the facts and the follow-up of the investigations, in order to keep statistical data necessary to control the risks to which the Group is subject.
- Any data concerning a report recorded outside the whistleblowing system must be kept securely (dedicated directory, encrypted files for example), with access only to persons authorized to process the report. The identity of all persons having access to the report must be listed in the whistleblowing reports follow-up file. All audit trails must also be kept securely. The registers and monitoring files must present pseudonymized data and are kept in order to be able to present statistical data necessary to control the risks to which Ayvens is subject.
- Access to the data constituting a whistleblowing report is subject to the need-to-know principle and all exchanges relating to whistleblowing reports must be secured and encrypted as far as possible.

The Group's whistleblowing system is based on a dedicated and secure platform provided by an external service provider. The latter does not have access to the content of the reports. The link is available on the Société Générale institutional website, the Ayvens website as well as on the Ayvens intranet.

SECTION 6. ACCESS TO THE VIGILANCE OFFICER/ WHISTLE BLOWING TOOL:

The Whistle Blower shall have right to access vigilance officer directly. Following are the contact details of the Vigilance Officer:

Ms. Shoba Krishnan:

Address: **Ayvens India Private Limited**

4th Floor, D Wing, Jolly Board Tower, I Think Techno Campus, Kanjurmarg (East),

Mumbai – 400 042, India

E-mail: shoba.krishnan@ayvens.com

Whistle Blowing tool: https://report.whistleb.com/en/societegenerale

SECTION 7. MISCELLENEOUS

MODIFICATION:

Ayvens may modify this policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with local, state, central and federal regulations and/or accommodate organizational changes within Ayvens.

DISCLOSURE IN ANNUAL REPORT:

The details of establishment of Vigil Mechanism/Whistle Blower policy shall be disclosed by Ayvens in its Annual Report in the Board's Report.

ANNUAL AFFIRMATION:

Ayvens shall annually affirm that it has not denied access by any Directors or employee or any of its stake holders, to the Vigilance Officer /Nominee Director and that it has provided protection to whistle Blower from adverse personnel action. The affirmation shall form part of the Annual Report of Ayvens.

CHAPTER 7. OTHER DOCUMENTS TO CONSULT

SECTION 1. EXTERNAL DOCUMENTS

N/A

SECTION 2. DOCUMENTS WITHIN THE SG CODE

- SG Procedure for managing Group tool whistleblowing reports
- SG Procedure for managing whistleblowing reports outside Group tools
- Communication procedure
- Oversight procedure.

SECTION 3. DOCUMENTS WITHIN AYVENS GROUP NORMS

- Ayvens Combating Inappropriate Behaviour Policy

APPENDIX 1: GLOSSARY

Term / Abbreviation	Description / explanation
BCO	Business Compliance Officer
COMCO	Compliance committee
CPLE	SG Compliance
CPLE/REG	SG Compliance Regulatory team
DNO	Declaration of No Objection (from DNB, The Dutch Central Bank)
IGAD	General Inspection & Audit Department
Local Ayvens Entity	Ayvens India Pvt. Ltd.
LCO	Local Chief Compliance Officer
LOD1	First level of defense: Business
LOD2	Second level of defense: Risk and Compliance
LOD3	Audit
RISQ	SG Risk team
SEGL/JUR	SG Legal team

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