



Whistle Blower Policy

This document contains information proprietary to Konverge.AI. The contents are provided for informational purposes only and may not be reproduced, distributed, or disclosed without prior written consent from Konverge.AI.

Revision History				
Applies to	All Associates			
Release Date	25-11-2025			
Revision Number	Nature of Change	Prepared By/Reviewed By	Approved By	Review Date
1.0	Initial Release of Document	HR Team	COO	25-11-2025
1.0	Reviewed No change	HR Team	COO	26-12-2025
1.1	Added sub section: Complaint / Grievance Redressal under Section C How to report	HR Team	COO	26-2-2026

TABLE OF CONTENTS

1. Objective3

3 . Scope3

4 . Terms and Definitions3

5 . Policy Description.....3

1. Objective

Konverge AI is committed to conducting business with integrity, transparency, and the highest ethical standards. We aim to maintain a safe and trust-driven culture where associates can freely report any misconduct or unacceptable practices. This policy provides a clear framework to encourage responsible whistleblowing and protect those who raise concerns about serious irregularities within the company.

2. Scope

This Policy is applicable to all Associates (Full Time Permanent, Contractors, Interns) of the company.

3. Terms and Definitions

The different terms mentioned in the policy have been defined as below:

Role	Definition
BPHR	Human Resources Operations
ICC	Background Verification
IIC	Associate Management Group

4. Policy Description

A. The policy covers malpractices and events which have taken place /suspected to place involving:

- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation of company data/records
- Financial irregularities, including fraud, or suspected fraud
- Criminal offence
- Pilferation of confidential/propriety information
- Deliberate violation of law/regulation
- Wastage/misappropriation of company funds/assets
- Breach of associates handbook, Policy or Rules
- Any other unethical, biased, favored, imprudent event

B. **Committees under this policy:**

1. Internal Control Committee

- The ICC will consist of two members nominated by the Whistle Blower Committee — one senior management representative and one HR representative.
- The ICC will receive complaints related to any breach of conduct from the whistleblower.
- The committee will review the complaint at a high level and forward it to the Internal Investigation Committee (IIC).
- The ICC will also propose three panel members for the IIC to the Whistle Blower Committee.
- The ICC will not involve itself in the detailed inquiry process.

2. Internal Investigation Committee

- The IIC will be an ad-hoc committee of three subject matter experts relevant to the reported complaint.
- The IIC will investigate cases forwarded by the Internal Control Committee (ICC).
- If sufficient evidence is found, the IIC will prepare a detailed report and submit it to the Whistle Blower Committee.
- If evidence is insufficient, the IIC may close the matter or, based on its seriousness, recommend suitable disciplinary actions or countermeasures to the Whistle Blower Committee.
- Members of the IIC will be proposed by the ICC and approved by the Whistle Blower Committee.
- The IIC will remain active until the case is fully closed.

3. Whistle Blower Committee

- The committee will review investigation findings and decide on appropriate disciplinary actions for ethical breaches.
- The committee will consist of:
 - I. Chief Operating Officer
 - II. Head of Human Resources
 - III. Legal SPOC – Internal and External

C. How to Report :

- Associates must report any Protected Disclosure to the Internal Control Committee as soon as possible, and no later than 30 days from becoming aware of the concern.
- The Internal Control Committee will conduct an initial assessment:
 - If the concern has no basis or does not fall under the scope of this policy, it may be dismissed, and the decision will be documented.
 - If further review is required, the matter will be forwarded to the Investigation Committee.

- The Investigation Committee will conduct a neutral, fact-based investigation without presumption of guilt and prepare a written report of findings.
- The Whistle Blower's identity will not be disclosed to the Investigation Committee unless strictly required for the investigation.
- The Investigation Committee will prepare a detailed record, including:
 - I. Facts of the case
 - II. Any previous related disclosures and outcomes
 - III. Any prior disclosures against the same Subject
 - IV. Actual or potential financial/other losses
 - V. Key findings
 - VI. Recommendations for disciplinary or corrective action
- The Investigation Committee must submit its report within 15 days of appointment, unless extended under exceptional circumstances.
- Upon receiving the report, the Whistle-blower Committee will:
 - I. If the disclosure is proved, accept the findings and initiate suitable disciplinary or preventive actions.
 - II. If not proved, close the matter.
 - III. For serious matters, take additional actions based on the Investigation Committee's recommendations.
 - IV. In exceptional cases, if the Whistle Blower is not satisfied with the investigation outcome, they may appeal directly to the Chairman of the Whistle-blower Committee.
- **Complaint / Grievance Redressal:**

Konverge AI provides an avenue for customers, business partners, vendors, and other external stakeholders to raise complaints or concerns related to unethical conduct, policy violations, or business practices. Such concerns may be reported through the official contact channel available on the company website at info@konverge.ai. All complaints received through this channel will be reviewed and addressed in accordance with the Konverge AI Whistle Blower Policy, which is publicly available on the company website.

D. Protection:

- Konverge AI ensures that no Whistle Blower will face any form of unfair treatment for reporting a Protected Disclosure in good faith. The organization strictly prohibits any act of discrimination, harassment, victimization, or adverse employment action against an individual for raising such concerns.
- Whistle Blowers are assured full protection against retaliation, including but not limited to:

- I. Threats or intimidation
 - II. Termination or suspension
 - III. Disciplinary action
 - IV. Transfer or demotion
 - V. Denial of promotion
 - VI. Discrimination or biased behavior
- Any direct or indirect misuse of authority to hinder their duties or prevent further disclosures
 - Konverge AI will take reasonable steps to minimize any challenges the Whistle Blower may face during or after the disclosure. Where required, the company will also support the Whistle Blower with appropriate guidance—such as during criminal or disciplinary proceedings.
 - The identity of the Whistle Blower will be kept strictly confidential. Any associate who assists in the investigation or provides supporting evidence will receive the same level of protection.

E. Disqualification

- While Konverge AI is committed to providing full protection to genuine Whistle Blowers, any misuse of this protection will lead to appropriate disciplinary action. The safeguards outlined in this policy do not extend to individuals who knowingly make false allegations or act with malicious intent.
- If a Protected Disclosure is found to be mala fide, frivolous, or intentionally misleading, the Whistle Blower will be subject to disciplinary action in accordance with company policies.

F. Policy Adherence

To ensure strict adherence to this Policy and to reinforce that every concern will be taken seriously, Konverge AI will:

- Ensure that neither the Whistle Blower nor any individual involved in processing the Protected Disclosure is subjected to victimization.
- Treat any instance of victimization as a serious offence and initiate appropriate disciplinary action against the responsible person(s).
- Maintain complete confidentiality throughout the process.
- Refrain from suppressing, altering, or concealing any evidence related to a Protected Disclosure.
- Take disciplinary action against any individual who destroys, manipulates, or attempts to conceal evidence pertaining to a Protected Disclosure.

- Provide all parties involved especially the subject an opportunity to be heard during the investigation.

G. Confidentiality

The Whistle Blower, committee members, and all individuals involved in the process must adhere to the following confidentiality requirements:

- Maintain strict confidentiality and secrecy regarding the Protected Disclosure.
- Refrain from discussing the matter in any informal, social, or non-official settings.
- Share information only with individuals who are directly involved in the investigation or require it to carry out the process.
- Ensure that all related documents are not left unattended at any time.
- Keep all electronic records, emails, and files password-protected.

Non-compliance with these confidentiality requirements will result in disciplinary action as deemed appropriate by Konverge AI.

H. Do's and Don'ts:

a. Do's

- **Do raise the matter promptly**

The sooner a concern is reported and investigated, the sooner any wrongdoing can be addressed and confidence restored.

- **Do report any reasonable suspicion to an authority**

Usually this will be your manager or the designated Whistle-blower recipient. If preferred or if the manager is implicated, you may contact the Head of Human Resources.

- **Do gather facts before reporting**

Take time to collect relevant information and evidence. Be as detailed and forensic as possible — the strength of the evidence is crucial to establishing the truth.

- **Helpful tips when reporting**

- Note dates, times, locations and people involved.

- Preserve documents, emails, receipts or any other supporting records.
- Provide a clear, chronological account of events.
- Identify potential witnesses and what they may know.

b. Don'ts

▪ **Don't ignore the issue**

If you suspect wrongdoing at work, do not keep it to yourself. Staying silent helps no one and may allow the issue to escalate.

▪ **Don't attempt to investigate on your own**

There are specific protocols for collecting evidence, and independent investigations can compromise the process. You are not required to prove your concern simply report it. If you already have relevant evidence, hand it over to the designated investigator.

▪ **Don't report your concern to unauthorized individuals**

Only designated authorities are trained and empowered to handle whistleblowing matters. Report your suspicions to them to ensure proper and confidential handling.

▪ **Don't delay**

You don't need full proof to raise concern. Report it as soon as you have a reasonable suspicion so the issue can be addressed promptly.