

# GLOBAL HORIZONS CAPITAL ADVISORS (IFSC) PRIVATE LIMITED

## WHISTLEBLOWER POLICY

(Pursuant to Regulation 15 read with Schedule II of the IFSCA (Capital Market Intermediaries) Regulations, 2025)

### 1. Purpose and Regulatory Basis

This Whistleblower Policy ("Policy") is adopted as a core component of the governance, integrity, and internal control framework of **Global Horizons Capital Advisors (IFSC) Private Limited** ("the Company"), a registered Investment Banker and Capital Market Intermediary operating from the International Financial Services Centre.

This Policy is issued in furtherance of **Clause 11 (Whistleblowing and Protection)** of the Company's **Code of Conduct** and is intended to encourage the reporting of misconduct, unethical behaviour, and regulatory breaches, while ensuring protection against retaliation for persons who report concerns in good faith.

This Policy must be read together with, and is complementary to, the Company's:

- **Code of Conduct**
- **Anti-Bribery and Anti-Corruption Policy**
- **AML, CFT & Sanctions Policy**
- **Confidentiality, Inside Information & Market Abuse Policy**
- **Disciplinary and Enforcement Matrix (Annexure I of Code of Conduct)**

In the event of any inconsistency, the stricter requirement shall prevail.

### 2. Applicability

This Policy applies to:

- Directors
- Key Managerial Personnel
- Senior Management
- Employees (permanent, contractual, deputed)
- Consultants, advisors, and any person acting for or on behalf of the Company

All such persons are referred to as "**Covered Persons**."

### 3. Matters That May Be Reported

Covered Persons are encouraged and, where appropriate, required to report in good faith any suspected or actual:

- breach of the Code of Conduct or any Company policy,
- bribery, corruption, kickbacks, or improper benefits,
- expense abuse, invoice manipulation, or financial misconduct,
- conflicts of interest or non-disclosure of conflicts,
- misuse of confidential or inside information, insider trading, or market abuse,
- money laundering, terrorist financing, or sanctions violations,
- regulatory non-compliance or misrepresentation to authorities,
- retaliation against whistleblowers or suppression of complaints, or
- any conduct that undermines market integrity, investor confidence, or the Company's regulatory standing.

Reports may relate to past, ongoing, or reasonably anticipated misconduct.

### 4. Reporting Channels

Reports under this Policy shall be made promptly to the **Company Secretary & Compliance Officer**, who is the designated authority for receipt and handling of whistleblower complaints.

Where a Covered Person believes that reporting through normal channels may not be appropriate, effective, or safe-such as where senior management is involved-the matter may be escalated through alternative whistleblowing mechanisms notified by the Company.

Reports may be made **confidentially** and, where permitted under applicable law, **anonymously**.

### 5. Good Faith Reporting

Whistleblowers are expected to report concerns **honestly and in good faith**, with reasonable belief that the information disclosed indicates misconduct or regulatory breach. The whistleblower is not required to prove the allegation, but must not make reports that are knowingly false, malicious, or frivolous.

Good faith reporting shall be protected even if the investigation ultimately does not substantiate the allegation.

## 6. Confidentiality and Protection

The Company shall take reasonable steps to ensure that:

- the identity of the whistleblower is kept confidential,
- information is shared strictly on a need-to-know basis, and
- investigations are conducted discreetly and professionally.

All information relating to whistleblower reports shall be handled in accordance with the Company's confidentiality obligations and information security standards.

## 7. Prohibition of Retaliation

Retaliation against a whistleblower who reports a concern in good faith is **strictly prohibited**.

Retaliation includes, but is not limited to:

- dismissal, suspension, or demotion,
- harassment, intimidation, or discrimination,
- adverse changes in role, compensation, or work conditions, or
- any act designed to disadvantage or victimise the whistleblower.

Any act of retaliation shall itself constitute a **serious breach** of the Code of Conduct and this Policy and shall attract disciplinary action in accordance with **Annexure I (Disciplinary and Enforcement Matrix)**.

## 8. Investigation and Action

All whistleblower complaints shall be:

- assessed objectively,
- investigated promptly and fairly, and
- handled without bias or undue influence.

The Company may take interim measures, where necessary, to protect evidence, prevent further misconduct, or safeguard the whistleblower.

Confirmed violations shall be dealt with strictly in accordance with the **Disciplinary and Enforcement Matrix**, and may result in disciplinary action, regulatory reporting, and legal proceedings, as applicable.

## 9. Interaction with Other Policies

Whistleblower reports relating to:

- bribery or corruption shall be handled in coordination with the **ABAC Policy**,
- AML, CFT or sanctions concerns shall be escalated under the **AML, CFT & Sanctions Policy**, and
- misuse of confidential or inside information shall be assessed under the **Confidentiality & Market Abuse Policy**.

## 10. Record-Keeping and Reporting

The **Company Secretary & Compliance Officer** shall maintain appropriate records of whistleblower complaints, investigations, and outcomes, while preserving confidentiality.

Periodic reporting on whistleblower matters, trends, and significant issues shall be made to the Board, as appropriate.

## 11. Review and Oversight

This Policy shall be reviewed periodically by the **Company Secretary & Compliance Officer**, and any material amendments shall be placed before the **Board of Directors** for approval.