

Whistle Blower Policy

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Introduction:

Bundl Technologies Private Limited ('Swiggy' or 'the Company' or 'We') is committed to complying with the laws that apply to it, satisfying the Company's Code of Conduct ('the Code'), and particularly to assuring that business is conducted in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. If potential violations of the Code or policies or applicable laws are not recognized and addressed promptly, both the Company and those working for or with the Company could face governmental investigation, prosecution, fines and other penalties.

Consequentially, in an endeavour to promote the highest ethical standards, the Company is committed to developing a culture where it is safe for all Employee(s), Other Party(ies) and Third Party(ies) to raise concerns or provide information about unethical or unacceptable practices and events of misconduct.

The purpose of Whistle Blower Policy ("This Policy" or "the Policy") is to provide a framework to promote responsible and secure raising of valid concerns. It aims to protect Employee(s), Other Party(ies) and Third Party(ies) wishing to raise a concern about serious irregularities within the Company.

DEFINITIONS:

- a. **"Code"** shall mean Code of Conduct of the Company as may be amended from time to time.
- b. **"Director"** refers to a Director appointed to the Board of the Company.
- c. **"Ethics Helpline Provider"** refers to an independent Third-Party service provider appointed by the Company to receive Whistle Blower Complaints.
- d. **"Employee(s)"** means every full-time or part-time Employee (whether regular, fixed-term or temporary) at every level and directors of the Company
- e. **"Other Party(ies)"** means any other individuals working for or with Swiggy and/ or its affiliates and/or subsidiaries including managers, officers, executives, interns, contractors, trainees, partners, seconded staff, home-workers, volunteers, casual workers and agency staff, interns, agents, sponsors, or any other person associated with Swiggy.

(Employee(s) and Other Party(ies) are collectively referred to as "You" or "you" in this Policy)
- f. **"Frivolous Complaint"** refers to any Complaint which is registered or attempted to be registered under this Policy with no evidence or on hearsay basis or with malafide intentions against the Subject arising out of false or bogus allegations.
- g. **"Investigators"** refers to those persons authorized, appointed and consulted or approached by the Company including the Auditors of the Company.
- h. **"Protected Disclosure"** or **"Complaint"** refers to any communication made in good faith that discloses or demonstrates information that may evidence violation of the Code or any improper/unethical activity.
- i. **"Subject"** or **"Subjects"** refers to a person or persons against or in relation to whom a Complaint has been made or evidence gathered during the course of an investigation.
- j. **"Third Party(ies)"** refers to suppliers, vendors, distributors, strategic partners, business partners who is associated with Company and/or its affiliates and subsidiaries.

- k. **“Whistle Blower”** refers to a Director, Employee(s), Other Party(ies) or Third Party(ies) making a Complaint under this Policy.

Scope:

This Policy is applicable to 'Employee(s)', 'Other Party(ies)' and 'Third Party(ies)'. This Policy also extends to all the subsidiaries and entities in which the Company either owns a majority interest or manages operations.

Objectives:

1. To enable Employee(s), Other Party(ies) and Third Party(ies) to raise their concerns at an early stage without the fear of victimization, subsequent discrimination or disadvantage
2. To check malpractices, misuse of Company’s property and mismanagement or wrongful conduct prevailing in the Company
3. To build and strengthen a culture of fairness, transparency and trust in the organization
4. To minimize the financial, legal, reputational and any other related risks emanating from such issues.

Coverage:

Any matter concerning the Company or its employees, including but not limited to:


1. Violation of any law or regulations, including but not limited to corruption, bribery, theft fraud, coercion, breach of contract and wilful omission, including but not limited to causing wrongful loss to the Company
2. Breach of code of conduct (including but not limited to),
 - a. Mismanagement, Gross Wastage or misappropriation of Company funds/assets
 - b. Manipulation of Company data/records/reports
 - c. Stealing cash/Company assets; leaking confidential or propriety information
 - d. Activities violating Company’s policies and process
 - e. An abuse of authority
 - f. An abuse of Brand Image of the Company
 - g. An act of discrimination or harassment
 - h. Any other unethical, biased, favoured, imprudent event
 - i. Deliberate concealment of information tending to show any of the above
3. Violation of any of Swiggy's policies
4. Any act or omission which causes or likely to cause reputational loss to Company

Please note that Complaints related to Human Resources’ issue(s) viz. salary and other compensation related matters, performance development, POSH etc. will not be covered under this Policy. All such issues to be directed to the respective Human Resources POC.

You may write to customer care department for any complaints related to defect or deficiency of Company’s services and in case you are a merchant, such complaints should be directed to respective partner support team.

How to report:

All Complaints should be addressed to the Ethics Helpline Provider appointed by Swiggy to provide our Employee(s), Other Party(ies) and Third Party(ies) with multi-faced independent reporting channels viz. Phone, Email, and Web Portal. The contact details of Ethics Helpline Provider are captured below:

Toll-Free :	1800 309 3981	
Email :	swiggy-hotline@tip-offs.in	
Web-portal:	www.swiggy-hotline.tip-offs.in	
Chatbot:	www.swiggy-hotline.tip-offs.in	

SCAN ME

After receiving the Complaint, the Ethics Helpline Provider will prepare an incident report, which will be shared with the Concerned Recipients (Heads of Assurance & Bus. advisory, Legal and Human Resources) in the next 2 business days of receiving the Complaint. Provided that the timeline for sharing such incident report shall be 3 business days of receiving the Complaint where the same has been provided in Hindi language.

In case the Complaint/concern is against one/more of the concerned recipients, the incident report will be shared with CEO of the Company.

While reporting incidents, Employee(s) and Other Party(ies) may choose to share identity with Company or remain anonymous or share their identity with Ethics Helpline Provider only. However, please note that sharing of identity is mandatory for the Third Party(ies).

In case, the Employee(s) or Other Party(ies) choose to remain anonymous, providing following information will be mandatory:

1. Name, designation and location of the Subject
2. Location of the incident
3. Evidence or source of evidence
4. Duration/Frequency of the incident
5. Detailed description of the incident

Investigation:

A preliminary review will be performed for all the Complaints reported under this Policy. Based on the findings of the preliminary review, Swiggy will decide to conduct the investigation. Swiggy may consider, at its sole discretion, to involve any internal or external investigators for the purpose of investigation, depending upon the circumstances or severity of the Complaint.

The decision to investigate taken by Swiggy is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may or may not support the conclusion that an improper or unethical act was committed.

Subject(s) of the Complaint shall have a duty to co-operate during investigation to the extent that such co-operation will not compromise self- incrimination protections available under the applicable laws. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be influenced, coached, threatened or intimidated by the Subjects.

Confidentiality:

The Whistle Blower, the Subject, and everyone involved in the process shall:

1. Maintain complete confidentiality of the matter
2. Not discuss the matter in any informal/social gatherings/ meetings
3. Discuss only to the extent or with the persons required for the purpose of completing the process and investigations
4. Not keep the papers unattended anywhere at any time

Timelines for closure:

The investigation shall be completed normally within 90 calendar days of the receipt of the Complaint.

Safeguards against retaliation

The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower. Complete protection will, therefore, be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further disclosures. Following safeguards have been incorporated to ensure protection against retaliation:

1. The identity of the Subject and the Whistle Blower will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
2. Any other Employee(s) or Other Party(ies) or Third Party (ies) assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower.
3. If an Employee(s) or Other Party(ies) or Third Party(ies) makes an allegation in good faith, which is not confirmed by subsequent investigation, no actions will be taken against that Employee(s) or Other Party(ies) or Third Party(ies), however allegations, which are proven as having been made maliciously or knowingly to be false, shall be viewed as a serious offense and Swiggy shall have a right to initiate appropriate disciplinary action.

Feedback mechanism

The feedback of the Complaint can be checked by contacting the Ethics Helpline Provider after 90 calendar days from the reporting of the Complaint.

Modifications:

Any amendment of any provision of this Policy must be approved in writing by the heads of Legal, Ethics and Integrity and Human Resources teams.

Exception:

Swiggy reserves unconditional right to amend, abrogate, modify and / or rescind any of the provisions of this policy at any time.

Retention of documents

Any information received or provided in relation to the Whistle Blower Complaint will be retained as per statutory requirements

Version History

Version Number	Date	Details
1.0	September 01, 2020	Approved by the Board of Directors vide its meeting dated September 01, 2020
2.0	October 12, 2020	Changes approved by the heads of Legal, Ethics & Integrity, and Human Resources teams.
3.0	January 23, 2023	Changes approved by the heads of Legal, Ethics & Integrity, and Human Resources teams.