



Whistleblower Policy

1. Purpose

To encourage the team members, partners, associates and other parties to report unethical behaviours, malpractices, wrongful conduct, fraud, violation of the company's policies & values, violation of law by any employee of InGovern without any fear of retaliation.

2. Scope

This Policy is an extension of the InGovern's Code of Ethics. The Whistleblower's role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in each case.

3. Applicability

This policy applies to all the team members of InGovern (including outsourced, temporary and on contract personnel), ex-employees, stakeholders of InGovern, including consultants (hereinafter referred to as 'Whistle Blower').

4. Definition

The definitions of some of the key terms used in this Policy are given below.

1. "Employee" means every employee of the Company, including the directors of the Company.
2. "Investigators" mean those persons authorized, appointed, consulted or approached by the Company including any regulatory agency.
3. "Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
4. "Whistleblower" means an employee or director making a Protected Disclosure under this Policy.
5. "Reportable Matter" means a genuine concern concerning actual or suspected:
 - a. Fraudulent practices, such as improperly tampering with InGovern's books and records, or theft of company property;
 - b. Corruption, including bribery and money laundering;
 - c. Breaches of InGovern's Code of Conduct.



6. Please note that complaints concerning personal grievances, such as professional development issues or Employee compensation, are not Reportable Matters for purposes of this Policy

5. Procedure to Register Complaints:

1. All Protected Disclosures should be addressed to the Managing Director of the Company for investigation.
2. Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English.
3. To enable the proper investigation of any Reportable Matter, a Protected Disclosure should include as much information as possible concerning the Reportable Matter. To the extent possible, the following information should be provided:
 - a. the nature of the Reportable Matter (for example, if the Reportable Matter concerns an alleged violation of the Code of Conduct, please refer to the provision of the Code of Conduct that is alleged to have been violated);
 - b. the names of the Employees to which the Reportable Matter;
 - c. the relevant factual background concerning the Reportable Matter (for example, if the Reportable Matter concerns a violation of the Code of Conduct, please include information about the circumstances and timing of the violation); and
4. To enable further investigation of Reportable Matters, Whistleblowers are strongly encouraged to provide their name and contact details whenever they make a Protected Disclosure under this Policy.

6. Protection of Whistle Blower policy

1. If a Whistle-blower does provide his or her name when making a Protected Disclosure, it will treat as confidential the identity of the Whistle-blower and the fact that a Protected Disclosure has been made, except as otherwise required by law and to the extent possible while allowing an investigation to proceed.
2. A Whistle-blower may make a Protected Disclosure without fear of retaliation or intimidation. InGovern prohibits its Employees from engaging in retaliation or intimidation that is directed against a Whistle-blower. Employees who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, which may include dismissal from employment.
3. If a Whistle-blower has been found to have made a deliberately false Protected Disclosure that Whistle-blower may be subject to disciplinary action, which may include dismissal InGovern's Whistle Blower Policy.



7. Conflict of Interest

Where a Protected Disclosure concerns any Investigator, they shall be prevented from acting in relation to that Protected Disclosure. In case of doubt, the Managing Director shall be responsible for determining whether an Investigator must recuse himself or herself from acting in relation to a Protected Disclosure.