

# **WHISTLEBLOWER POLICY**

**Aionion Capital Market Securities Pvt. Ltd.**

## **1. Preface**

Aionion Capital Market Securities Pvt. Ltd. (hereinafter referred to as 'Company' or 'Aionion') is committed to maintaining the highest standards of integrity, transparency, and ethical conduct. This Whistleblower Policy is intended to encourage employees and stakeholders to report genuine concerns about unethical behavior, actual or suspected fraud, and violations of applicable laws or regulations, including those laid out by the Securities and Exchange Board of India (SEBI).

## **2. Objective**

- i. To provide a framework for reporting violations or misconduct.
- ii. To safeguard whistleblowers from any kind of victimization or retaliation.
- iii. To investigate reported incidents promptly and appropriately.

## **3. Scope**

This policy applies to:

- i. All employees (permanent, temporary, contractual etc.)
- ii. Clients and investors
- iii. Business partners, vendors, and consultants
- iv. Any person dealing with the company

## **4. Definitions**

- i. Whistleblower: Any individual who reports a concern under this policy.
- ii. Protected Disclosure: Any communication made in good faith that discloses unethical or improper activity.
- iii. Subject: The person against whom a complaint is raised.

## **5. Reportable Matters**

This policy covers concerns related to:

- i. Misuse of client funds or securities
- ii. Insider trading or front running
- iii. Violation of SEBI or exchange regulations
- iv. Conflict of interest
- v. Bribery or financial misconduct
- vi. Data privacy breaches
- vii. Non-compliance with legal or regulatory obligations
- viii. Harassment or abuse of power

## 6. Reporting Mechanism

### 6.1 Reporting Channels

Whistleblowers may report their concerns through any of the following channels:

- i. **Email:** Complaints may be submitted to the compliance officer via the compliance email ID at [compliance@aionioncapital.com](mailto:compliance@aionioncapital.com);  
Or, directly to the director at [anish@aionioncapital.com](mailto:anish@aionioncapital.com)
- ii. **Postal Mail:** Written complaints can be sent in a sealed envelope marked “Confidential – Whistle Blower” to:
  - a. Compliance Officer/Director,
  - b. 3rd Floor, Meerlan Towers, No.33,  
Hanumantha Road, Royapettah,  
Chennai - 600 014

### 6.2 Acknowledgment and Investigation

- i. Upon receipt of a complaint, the Compliance Officer shall acknowledge the same (where identity is known) within seven (7) working days.
- ii. A preliminary review by Compliance officer or an internal committee by the Board shall be conducted to determine the merit of the complaint.
- iii. If found credible, a formal investigation shall be initiated and completed within a reasonable timeframe.
- iv. The investigation will be impartial, timely, and documented.
- v. The subject will be given an opportunity to respond before a decision is made.
- vi. The findings and recommended actions shall be presented to the Board of Directors.

## 7. Protection of Whistleblower

It is required that employees disclose their identities while raising concerns in such cases. This is because disclosing their identities can assist in obtaining additional details or evidence that may be necessary during the investigation process.

The Policy ensures strict confidentiality regarding the identity of the Whistleblower, both during and after the investigation. Aionion will not release the whistleblower identity unless required by law. Disclosing the identity will not have any adverse impact on the performance appraisal, work assignments, or any other matters related to their engagement with Aionion.

- i. The identity of the whistleblower will be kept confidential.
- ii. Retaliation or harassment against the whistleblower is strictly prohibited.

- iii. Disciplinary action will be taken against those who threaten or harm a whistleblower.

## **8. Disciplinary Action**

- i. If allegations are substantiated, disciplinary action, including termination or legal recourse, will be initiated.
- ii. False or malicious complaints may lead to appropriate disciplinary action against the complainant.

## **9. Reporting to Regulators**

Serious concerns, especially those involving violations of SEBI regulations, will be reported to SEBI or relevant stock exchanges, as required.

## **10. Record Keeping**

Records pertaining to the complaint shall be appropriately maintained by the Compliance Department in accordance with the respective company's record-keeping practices and applicable data protection regulations. The Compliance Head will ensure the confidentiality and security of these records, protecting the privacy of the Whistleblower and other individuals involved in the process.

All complaints and the corresponding investigation records shall be maintained securely for a minimum period of eight (8) years or as per applicable legal and regulatory requirements.

## **11. Misuse of the Policy and Disciplinary Considerations**

Any misuse of this Policy by a Whistleblower for personal gain, malicious intent, or to pursue grievances unrelated to genuine ethical concerns shall be viewed seriously and dealt with stringently by Aionion. The whistleblowing mechanism is designed to promote integrity, transparency, and responsible conduct within the organization, and it must not be exploited for individual advantage or retaliatory motives.

It is further clarified that the protections afforded under this Policy do not exempt any employee from adherence to the Company's Code of Conduct, internal policies, or compliance requirements. This Policy does not prevent Aionion from initiating appropriate disciplinary or remedial action against an employee who is found to have violated such rules or standards.

Any proceedings initiated by the company to investigate violations of internal policies or the Code of Conduct are independent of this Policy and shall be treated separately from any concerns raised under the whistleblower mechanism.

That said, the safeguards provided under this Policy remain fully applicable in instances where the Board of Directors determines that a protected disclosure has been made in good faith and based on a reasonable belief that misconduct or unethical behavior has occurred.

## **12. Policy Review**

This policy will be reviewed annually by the Board or Compliance Committee and amended as needed to ensure continued compliance with SEBI and exchange guidelines.

The Board of Directors shall have the authority to periodically review and revise this Policy, with due intimation to the Board of Directors. The Committee may also introduce or update supporting guidelines, procedures, reporting channels, and related documentation to ensure effective implementation of the Policy.

In the event of any amendments, clarifications, or circulars issued by regulatory or statutory authorities that conflict with the provisions of this Policy, the applicable provisions of such external directives shall take precedence. The Policy shall be deemed to stand modified to the extent required, effective from the date specified in the relevant directive.

This provision is intended to ensure that the Policy remains current and compliant with prevailing laws, regulatory requirements, and evolving industry best practices, thereby preserving its relevance and effectiveness in addressing whistleblower concerns.

## **13. Contact**

For any questions or concerns regarding this policy, please contact the Compliance Officer at [Compliance@aionioncapital.com](mailto:Compliance@aionioncapital.com) or at Mob. No. 7305088516