

## **POLICY ON MONITORING AND REPORTING OF FRAUD**

**ORIX Corporation India Limited**

**(Formerly known as ORIX Auto Infrastructure Services Limited)**

V.4

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**(I) Preamble:**

ORIX Corporation India Limited (OCIL), direct subsidiary of ORIX Corporation (ORIX), Japan, has adopted ORIX Group Code of Conduct (COC) which, *inter-alia* and *amongst others*, specified “Values and Guiding Principles”. The said COC sets out Guiding Principles that align with and embody the Core Compliance Values and form the foundation on which ORIX’s business is built. Its daily commitment to living the Core Compliance Values and following the Guiding Principles ensures that ORIX Group’s Purpose of “Finding Paths. Making Impact” and Culture of finding “Power in Diversity,” “Adventure in Challenge,” and “Opportunity in Change” are achieved in the right way, with the highest level of integrity. With the ORIX Group Purpose & Culture pointing the direction, the Core Compliance Values are its compass, and the Guiding Principles provide road map. “Integrity”, amongst others, is one of the Core Compliance Values which specifies prevention on bribery; corruption, fraud; prohibits money laundering; illegal and unethical transactions including but not limited to prohibition on engaging in any action, relationship or interest that is or could lead to a conflict of interest.

One of the several elements of illegal and unethical transaction is Fraud. Fraud can have a devastating effect on OCIL because it could result in significant financial loss and other long-term business repercussions. Any allegations of Fraud will be taken seriously, with no exceptions. All individuals, regardless of position, title, or tenure with OCIL are expected to remain vigilant and report any suspicious activity to the Compliance Department or at Hotline referred to in this Policy.

**(II) Purpose:**

- (1) OCIL upholds a zero-tolerance approach regarding bribery and corruption (as defined in the Anti-Bribery and Anti-Corruption Policy of OCIL).
- (2) The Policy is established with an intent to promote a culture founded on Fraud (*as defined below*) prevention, awareness, and accountability, and shall clarify acts that are considered to be suspicious. This Policy shall also provide guidance to prevent, detect, report, and investigate when fraudulent acts are suspected and subsequently proven.
- (3) OCIL will identify and promptly investigate any suspected fraudulent or related dishonest activity against OCIL or other parties with whom OCIL has dealings. OCIL will take appropriate disciplinary and legal actions including but not limited to the possibility of termination of employment, restitution, and forwarding information to the appropriate authorities for prosecution/reporting.

**(III) Applicability:**

- (1) This Policy applies to any Fraud or suspected Fraud in OCIL, involving employees (including contractual employees) as well as, consultants, vendors, suppliers, service providers, contractors, customers, chartered accountants, advocates, outside agencies and / or any other parties having a business relationship with OCIL (hereinafter collectively referred to as “Persons”).
- (2) This Policy is applicable to any and all act(s) or omission(s) that constitutes fraudulent or suspected fraudulent activity.

**Note:**

- (a) Please refer to the definition of Fraud for further details.
- (b) Please refer Incident Management Rule of OCIL for the purpose of reporting to Incident

Reporting Group or to ORIX Corporation depending on Level of Incident as defined in the said Incident Management Rule

**(IV) Definitions:**

- (1) "Approval Authority Matrix ("AAM")" means the authority matrix adopted by the Board of Directors of the Company and as may be amended from time-to-time defining the authority of shareholders, Board of Directors, Committees of Board, Management, Head of the Department (also known as "Senior Management Team") etc.
- (2) "Audit Committee" means the Audit Committee of Board of Directors of OCIL constituted basis provisions of Companies Act, 2013 and the relevant applicable regulations.
- (3) "Board of Directors" or "Board" means the Directors of OCIL.
- (4) "Date of Occurrence" shall mean the date when the actual Fraud has taken place or occurred or started taking place, as evidenced / reported in the audit or other findings.
- (5) "Date of Detection" shall mean the actual date when the Fraud came to light in the concerned branch / audit / department or reported at Reporting Channel, as the case may be.
- (6) "Date of Classification" shall mean date when classification of Fraud is done in OCIL by the Management of the Company
- (7) "Early Warning Signals(EWS)" refers to a fact, event, or set of circumstances, or other information that may indicate a potential legal compliance concern for illegal or unethical business conduct or giving rise to potential Fraud or suspicion which requires deeper investigation for initiating preventive measures. When conducting due diligence of customers, EWS should trigger concern for further analysis. Indicative EWS for the purpose of this Policy are defined in Annexure 1 for for System Based Monitoring and Manual Based Monitoring.
- (8) "Fraud" Despite having contractual dimension, tortuous dimension and criminal dimension of Fraud, there is no definition of Fraud in legislation like Companies Act, 2013, Bhartiya Nyaya Sanhita Act, 2023 etc. However, the Indian Contract Act, 1872, defines Fraud which means and includes any of the following acts committed by a party to a contract, or with his connivance, or by his agents, with intent to deceive another party thereto his agent, or to induce him to enter into the contract:
  - (a) the suggestion, as a fact, of that which is not true, by one who does not believe it to be true;
  - (b) the active concealment of a fact by one having knowledge or belief of the fact;
  - (c) a promise made without any intention of performing it;
  - (d) any other act fitted to deceive;
  - (e) any such act or omission as the law specially declares to be fraudulent.

In view of the above, following activities (indicative and not exhaustive) shall be termed as Fraud (which shall include suspected Fraud) for the purpose of the Policy:

- (a) criminal breach of trust;
- (b) Fraudulent encashment through forged instruments;
- (c) Falsification of books of accounts or manipulation of books of account or passing or approving wrong journal entries (knowing it to be false or incorrect within established

- guidelines on accounting or established policies of OCIL) or through fictitious accounts and conversion of property;
- (d) Wilful falsification, destruction, alteration, mutilation of any book, electronic record, paper, writing, valuable security or account with intent to defraud.
  - (e) Fraudulent electronic banking / digital payment related transactions; and
  - (f) Misfeasance, embezzlement or misappropriation of funds or negligence and cash shortage etc;
  - (g) Forgery or alteration of financial documents / records without requisite approvals.
  - (h) Impropiety in handling or reporting of financial transactions with *malafide* intention.
  - (i) Theft, disappearance, or destruction of assets of OCIL.
  - (j) Unauthorised credit facilities extended for reward or for illegal gratification.
  - (k) Forgery as defined under Section 336 of The Bhartiya Nyaya Sanhita Act, 2023<sup>1</sup>;
  - (l) Cheating as defined under Section 318 of The Bhartiya Nyaya Sanhita Act, 2023<sup>2</sup>;
  - (m) Irregularities in foreign exchange transactions.
  - (n) Execution of any documents for and on behalf of OCIL with *malafide* intention and without valid authorisation.
  - (o) Unauthorised handling of securities charged to the Company;
  - (p) Any other type of Fraud not coming under the specific heads as above.

Cases of 'cash shortages' and 'irregularities in foreign exchange transactions' referred to in sub clause number (f) and (m) above are to be reported as Fraud if the intention to cheat / defraud is suspected/proved. However, the following cases where fraudulent intention is not suspected / proved, at the time of detection, will be treated as Fraud and reported accordingly:

- (i) Cases of cash shortages more than ₹10,000/- and
  - (ii) Cases of cash shortages more than ₹ 5000/- if detected by Management /auditor / inspecting officer and not reported on the occurrence by the persons handling cash.
- (9) "Management" shall include (a) Managing Director and CEO of the Company and (b) the Local representative Director of ORIX Corporation, Japan, the holding Company.
  - (10) "Manual Based Monitoring" for the purpose of this Policy means monitoring of Early Warning Signals indicators, as specified in Annexure-1, manually by the Company".
  - (11) "Reporting Channel "shall mean various channel where Fraud or suspected Fraud shall be reported by employee(s) who discover the Fraud or suspected Fraud and described in Paragraph Number XII below.
  - (12) "Senior Management Team" for the purpose of this Policy means employees of OCIL who are members of its core management team which is known as Executive Committee of Management (not being Committee formulated by Board of Directors) and excluding Board of Directors. It would comprise all members of management one level below the Managing Director and Chief Executive Officer (CEO), i.e. Business Heads and Functional Heads (Head of Department).
  - (13) 'System Based Monitoring' for the purpose of this Policy means monitoring of Early Warning Signal indicators, as specified in Annexure-1, by the Company.

<sup>1</sup> Whoever makes any false documents or false electronic record or part of a document or electronic record, with intent to cause damage or injury], to the public or to any person, or to support any claim or title, or to cause any person to part with property, or to enter into any express or implied contract, or with intent to commit fraud or that fraud may be committed, commits forgery.

<sup>2</sup> Cheating and dishonestly inducing delivery of property. — Whoever cheats and thereby dishonestly induces the person deceived to deliver any property to any person, or to make, alter or destroy the whole or any part of a valuable security, or anything which is signed or sealed, and which is capable of being converted into a valuable security

(14) “**Third Party**” means the direct selling agents, dealers, etc. appointed by the Company.

**(V) Fraud Handling Process:**

**(1) Detection of Fraud:**

- (a) The Senior Management Team and other departmental heads who are not part of Senior Management Team are responsible for the detection and prevention of Fraud. Each member of the Senior Management Team / other departmental heads who are not part of the Senior Management Team should be familiar with the types of improprieties that might occur within their area of responsibility and be alert for any indication of irregularity.
- (b) As soon as an actual, suspected or attempted Fraud is noticed or detected by any employee, they should immediately gather all relevant details and inform their Business Head / Department Heads or to the Reporting Channel.
- (c) In case some information or details are not readily available, the submission of the report or other available details should not be held up. The remaining information may be furnished immediately thereafter.

**(2) Fraud Monitoring:**

**(a) With reference to any transactions triggering any EWS:**

- (i) The Department Head in charge shall monitor activities in relation to their respective area of responsibility including the transactions with the customers and remain alert on any of the indicators of EWS.
- (ii) In case where there is a suspicion / indication of existence of any indicators of EWS, the Company shall use an external audit or an internal audit for further investigation in such accounts upon approval by the Managing Director and the Local representative Director of ORIX Corporation, Japan, the holding Company (hereinafter referred to as ‘Management’).
- (iii) The Management shall consider following criteria while determining the appointment of an internal or external auditor, including forensic audit, if required for the purpose of investigation under this sub clause:
  - qualified to conduct audit under relevant statues
  - should have an established track record of at least three years in the field of investigation of Fraud
  - should not be statutory auditor of the Company
  - The auditors appointed under this clause shall carry out the due diligence in the with the established practice and submit report to the Management or Investigating Team within 90 days of the appointment.

Note: The contractual agreement with the auditors shall, *inter alia*, contain suitable clauses on timeline for completion of the audit and submission of audit report within timeline as mentioned above.

- (iv) In cases where the audit report submitted by OCIL appointed external auditor remains inconclusive or is delayed due to non-cooperation by the Persons or customer, OCIL shall conclude status of the account as Fraud or otherwise based on the material available on record and own internal investigation / assessment in such cases by following principles of natural justice<sup>3</sup>.
- (v) In case an account is identified as a Fraud by OCIL, the customer account of other group companies, in which one or more promoter(s) / whole-time director(s) are common, shall also be subjected to examination from Fraud angle.

(b) **Confirmation from Third Party Agent (TPA):**

In case of services of Third Party is availed as a part of the business / services requirement, suitable clause to be inserted in the agreement with such TPA about holding them accountable in a situation where negligence / malpractice by them is found to be cause for Fraud.

(c) **Staff Accountability:**

OCIL shall initiate and complete the examination of staff accountability in all Fraud cases in a time-bound manner in accordance with the investigation procedure as prescribed in para VII below.

In cases of Fraud involving Senior Management / Department Head of OCIL or MD/ CEO / Executive Director/ Executives of equivalent rank<sup>4</sup>, then Audit Committee of OCIL shall initiate the examination of their accountability and place it before the Board.

(3) **Penal Measures:**

Persons / entities classified and reported as Fraud by OCIL and entities and Persons associated<sup>5</sup> with such entities, shall be debarred from initiating any new relationship with the Company and OLFS, its wholly-owned subsidiary, for a period of five years from the date of full repayment of the defrauded amount / settlement amount agreed upon in case of a compromise settlement.

**(VI) Roles and Responsibilities for Reporting and of Review of Fraud:**

(1) Reporting by:

(a) By Employees:

An employee / complainant who discovers Fraud shall inform either the Compliance Department or the Reporting Channel immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative or any other inquirer should be

<sup>3</sup> serving notice and giving an opportunity of minimum 21 days for submission of a representation / response

<sup>4</sup> Such executive shall not participate in the meeting of the Board / ACB in which their accountability is to be considered.

<sup>5</sup> if it is an entity, another entity will be deemed to be associated with it, if that entity is (i) a subsidiary company as defined under clause 2 (87) of the Companies Act, 2013 or (ii) falls within the definition of a 'joint venture' or an 'associate company' under clause (6) of section 2 of the Companies Act, 2013.

directed to the Compliance Department. No information concerning the status of an investigation will be given out.

The individual who reports a Fraud should be aware of the following:

- (i) Do not contact the suspected individual in an effort to determine facts or demand restitution; and
- (ii) Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Investigating Team.

(b) By Senior Management Team/Department Head:

Senior Management Team / Department Head is responsible to report any potential instance of Fraud to the Compliance Department, immediately under this Policy as well as to Incident Reporting Group or Incident Management Department under Incident Management Rule of OCIL and as defined therein.

(2) Reporting to:

(a) Audit Committee:

- (i) All individual cases of Fraud irrespective of the amount involved shall be placed before the Audit Committee for review, covering the following
  - Root Cause analysis of the fraud; and
  - Corrective action

(b) Board of Directors: The following shall be placed before the Board :

All Frauds of ₹ 0.1 mn and above shall be reported promptly on their detection. Such reports shall include:

- (i) failure on the part of the concerned officials;
- (ii) consideration of initiating of appropriate action against the officials responsible for the Fraud.
- (iii) Other matters as specified in Incident Management Rule such as:
  - Risk type and severity of impact;
  - Date of Occurrence, Date of Detection and Date of Classification;
  - Background of the Fraud incident and responses to date, if any;
  - Root cause and responsible party known in the Fraud incident at the time of submission of the report;
  - Demands from other party or parties involved in the Fraud incident, if applicable;
  - next steps or action plans in response to and management of the Fraud incident.

(c) Incidents of Fraud cases which are not closed as per this Policy shall be reported in the Global Compliance Report of the Company and placed before the Audit Committee and Board, through Global Compliance Report, for its review on quarterly basis



(d) Group Compliance Department of ORIX:

No sooner is the Fraud detected or reported, as the case may be, the Compliance Department shall simultaneously (not later than 3 working days from the Date of Detection) shall notify to Global Compliance Department about the Fraud irrespective of the amount involved in the Fraud and all relevant details included update on investigation process and final outcome. Wherever necessary, the Global Compliance Department shall have to be consulted to arrive at a conclusion before submission of the outcome to Audit Committee or Board.

(e) To Law Enforcement Agencies (LEA) / police:

The Company shall report immediately incidents of Fraud to LEA / state police subject to the applicable laws.

The Head-Legal of the Company or his designate is authorized for reporting incidents of Fraud to LEAs and for proper coordination to meet the requirements of the LEAs.

**(VII) Investigation:**

- (1) The Investigating team consisting of one or more members of Compliance Department ('Investigating Team') shall have the responsibility to properly screen and investigate Fraud. Wherever necessary, the Compliance Department may seek help either from the Internal Audit Department in investigation of Fraud or external third-party consultant, depending on sensitivity / gravity involved.
- (2) Upon trigger of EWS, and on the basis of recommendation from the Credit/Operations/other Department, the Investigating Team shall examine whether the account needs to be investigated from potential Fraud angle.
- (3) The Investigating Team or any of its members will have:
  - (a) Free and unrestricted access to all the company records and premises, whether owned or rented; and
  - (b) The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities when it is within the scope of their investigation.
- (4) If any employee of OCIL is involved in the Fraud, then the Management will determine when to notify the employee and whether to recommend to Management to suspend the employee or terminate his services.
- (5) All reports of suspected Fraud will be taken seriously, and the Investigating Team will make decisions based on the nature and seriousness of the allegation and facts of each case, whether to consult with external legal counsel or to utilize outside resources / consultants / experts to further the investigation.
- (6) Investigation results will not be disclosed or discussed by the Investigating Team with anyone other than those who have a legitimate need to know.

- (7) The Investigating Team is satisfied that an event of potential Fraud has occurred, will provide its recommendations with all the material facts to the Management.
- (8) If the investigation substantiates that Fraud has occurred, the Management will issue an investigation report to the Audit Committee and Board as per clause VI(2) above. Depending on the severity and sensitivity involved, the Management may recommend forensic audit of Fraud caused to be carried out by third party consultant expert in the field.

**(VIII) Role of Auditors (Statutory and Internal):**

- (1) During the audit, Auditors may come across instances where the transactions with the customers or the documents point to the possibility of fraud. In such a situation, the auditor shall immediately bring it to the notice of the Management and if necessary, to the Audit Committee of the Company for appropriate action as per the Companies Act, 2013.
- (2) Internal Audit Department of the Company shall assess and report on controls and processes involved in prevention, detection, classification, monitoring, reporting, closure and withdrawal of Fraud cases, and also weaknesses observed in the critical processes in the Fraud risk management framework including delay in reporting, non-reporting, conduct of staff accountability examination, prudential provisioning, etc

**(IX) Corrective Action:**

- (1) Depending on the seriousness of the offense and the facts of each case, Disciplinary Action, as stated below in para (XII) may be taken against an employee can range from written notification and a probationary period, up to and including dismissal where appropriate, taking legal action, either civil or criminal.
- (2) In cases involving monetary losses, OCIL will pursue recovery of losses.
- (3) Individuals at all levels in OCIL will be treated equally regardless of their position, years of service, or affiliation with the company.
- (4) Specific Actions:
  - (a) Decisions to prosecute or refer investigation results to the appropriate Law Enforcement Agency / state police will be made as specified in Para VI (2)(d) above.
  - (b) The final determination regarding actions against an individual or business found to have committed Fraud will be made by the Management

**(X) Write off the amount of loss:**

Whenever a case is cleared from all angles such as Law Enforcement Agency / employee etc. and loss arising out of Fraud has been crystallized and there are absolutely no chances of recovery, then the approval for the write-off shall be obtained as per the Approval Authority Matrix.

**(XI) Disclosure in Financial Statement – Notes to Account:**

The amount related to Fraud shall be reported in the Financial Statement – Notes to Account of OCIL for the financial year to which it pertains.

## **(XII) Disciplinary Action:**

Failure to comply with this policy would attract the disciplinary action in the following cases: -

- (1) An employee who is engaged in any form of Fraud is subject to e Correction Action as specified in para IX above.
- (2) An employee who suspects or discovers Fraud and fails to report the same as required by this Policy or delays in reporting the same or an employee who intentionally reports false or misleading information shall be subject to any of following disciplinary action:
  - Reprimand
  - Postponement or stoppage of increment or promotion
  - Demotion to a lower post or grade or to a lower stage in his incremental scale
  - Recovery of the whole or part of any pecuniary loss caused to the Company
  - Discharge
  - Dismissal

## **(XIII) Reporting Channel**

Employees who have a reasonable basis for believing fraudulent acts/ Fraud have/has occurred have a responsibility to report the suspected act to the Compliance Department, immediately. Failure to report suspected Fraudulent activity/ Fraud in a timely manner according to the procedures below will also be subject to disciplinary action. The procedures for doing so anonymously are laid out in the Whistleblower Policy of OCIL. Alternatively, employees can report suspected fraudulent or corrupt acts as stated below:

- (1) Hotline Phone No. 022 5097 2922
- (2) India Compliance Department ([compliance@orixindia.com](mailto:compliance@orixindia.com))
- (3) Whistle Blower Hotline ([whistle-blower@orixindia.com](mailto:whistle-blower@orixindia.com))
- (4) Group Compliance Division Hotline ([orix\\_global\\_hotline@orix.jp](mailto:orix_global_hotline@orix.jp))
- (5) ORIX Group Global Hotline ([orixcorporation.ethicspoint.com](http://orixcorporation.ethicspoint.com)) for ORIX Group companies worldwide excluding Europe (*for our group companies in Europe, please use the global hotline information issued from OCE Compliance*)
- (6) ORIX Group Audit Committee Secretariat for any accounting concerns ([audit\\_committee\\_secretariat@orix.jp](mailto:audit_committee_secretariat@orix.jp))

## **(XIV) Responsibilities:**

- (1) Senior Management Team and Department Head

The Senior Management Team / Department Head is responsible for:

- (a) Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- (b) Preventing and detecting Fraud as far as possible;
- (c) Assessing the types of risk involved in the operations for which they are responsible;
- (d) Reviewing the control systems for which they are responsible regularly;
- (e) Ensuring that controls are being complied with and their systems continue to operate effectively;

- (f) Implementing new controls to reduce the risk of similar Fraud occurring where Frauds have taken place.
- (g) Senior Management Team / Department Head shall be responsible for implementation of a robust Framework for EWS within OCIL.

**(2) Employees:**

Every employee of OCIL is responsible for:

- (a) Acting with propriety in the use of OCIL resources / assets and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- (b) Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- (c) Being alert to the possibility that unusual events or transactions could be indicators of Fraud;
- (d) Alerting their manager when they believe the opportunity for Fraud exists e.g., because of poor procedures or lack of effective oversight;
- (e) Reporting details immediately if they suspect that a Fraud has been committed or see any suspicious acts or events; and
- (f) Cooperating fully with whoever is conducting internal checks or reviews or Fraud investigations.

**(3) Compliance Department:**

Besides investigation as specified above, the Compliance Department shall be responsible for making sure that all employees are aware of this Policy and know what their responsibilities are in relation to combating Fraud and ensuring that appropriate training is made available to all employees.

**(4) Management:**

- (a) Review the investigation report received from the Investigating Team and conclude or classify whether Fraud has been occurred or otherwise
- (b) Determine and approve the action to be taken against (i) the Person / Entity found to have committed Fraud (ii) against employee of the Company if he/she found to have committed Fraud in terms of the Policy.
- (c) Approve the appointment of an internal or external auditor, if required for the investigation of Fraud, as per the criteria laid in this Policy.
- (d) Submit Report to the Audit Committee on its action.

**(XV) Closure of Fraud:**

A Fraud case shall be closed, if it is concluded from all the following angles and prior approval of the Board of Directors or Audit Committee, as the case may be, of OCIL is solicited:

- (1) The Fraud cases pending with LEAs / Court are disposed of; and
- (2) The examination of employee's accountability has been completed (if found to be involved);
- (3) The amount of Fraud has been recovered or written off;
- (4) Insurance claim wherever applicable has been settled;
- (5) Senior Management Team has reviewed the system and procedures, identified as the causative

factors and plugged the lacunae and the fact of which has been reported to the Audit Committee

**(XVI) Review of Policy:**

The policy shall be reviewed once in a year or as and when required.

**(XVII) Amendments:**

The Board reserves the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever. However, no such amendment or modification shall be binding unless the same is notified in writing.

**Framework for Early Warning Signals (EWS) for detection of Fraud**

**(1) EWS Framework:**

The EWS Framework will consist of the following:

- (a) The Company will have an internal system which will alert / trigger for the EWS.
- (b) The Company will initiate remedial action immediately on triggers / alerts from EWS System.
- (c) The Chief Risk Officer will review the internal controls and systems once in a financial year

**(2) EWS Framework for other financial / non-credit related transactions:**

- (a) The EWS system will be continuously upgraded for enhancing its integrity, robustness, monitoring of transactions efficiently and prevent fraudulent activities and same shall be tested periodically.
- (b) The Company will ensure that integrity of the system is maintained, and personal and financial data of the customers are secured and transaction monitoring for prevention / detection of potential Fraud is working on real-time basis<sup>6</sup>
- (c) The transactions / unusual activities will be monitored, specifically in the non-KYC compliant and money mule accounts etc., so as to contain unauthorised / fraudulent transactions.
- (d) Credit Department shall extensively monitor and analyse transactions, in order to identify unusual patterns and activities for initiating appropriate measures towards prevention of fraudulent activities.

**(3) EWS Indicators:**

The following indicators shall be monitored through System Based Monitoring and Manual Based Monitoring as part of EWS Framework on an ongoing basis by the department as mentioned below:

Sr. No.	EWS Indicators	System /Manual Based Monitoring	Responsibility
(a)	Poor/non-disclosure of materially adverse information and qualification by the statutory auditors of the customer.	Manual Based Monitoring	Credit/Business
(b)	Frequent change in accounting period and/or accounting policies of the customer.	Manual Based Monitoring	Credit team
(c)	Any Whistle blower cases received by the Company	Manual Based Monitoring	Compliance team
(d)	Obtained facility from the Company based on the forged document or forged documents submitted	Manual Based Monitoring	Credit/ Billing & Collection/

<sup>6</sup> or with a minimum time lag without compromising the effectiveness of the outcome of EWS system in prevention / detection of potential frauds.

	during the tenure of lease		Business
(e)	Quick mortality (Lease customer account turning into NPA into a year of disbursement)	Manual Based Monitoring	Credit
(f)	Any negative media news received during the daily screening of the customers of the Company.	System Based Monitoring (SAMS external system)	Credit

### **Modification History**

<b>Date Revision</b>	<b>of</b>	<b>Version</b>	<b>Description</b>	<b>Authors</b>	<b>Approved by</b>
27-09-2012		1	Initial Draft	Mr. Parthasarathi Ray	Board Directors of
31-10-2023		2	Revised	Corporate Secretary and Compliance Department	Board Directors of
08-11-2024		3	Revised	Corporate Secretary and Compliance Department	Board Directors of
20-11-2025		4	Revised	Compliance Department (Regulatory)	Board Directors of