

HITACHI PAYMENT SERVICES PVT LTD (HPY) Whistle-blower Policy

Purpose

HPY is committed to conducting all its business dealings in an ethical and transparent manner. The purpose of the Whistle-blower Policy is to encourage employees who have a reasonable belief that an employee/employees has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, to immediately report such information to the Compliance Committee (CC). The Compliance Committee reports directly the Managing Director of HPY.

Eligibility

This policy applies to all the employees of HPY, including outsourced and temporary, part-time and full-time Consultants.

Role of the Complainant

- The Whistle Blower/Complainant's role is that of reporting party with reliable information.
- They are not required to act as investigators nor are they required to determine the appropriate remedial action.
- They should also not act nor participate in any investigation activities unless requested by the CC.

Procedure to use the Reporting System:

1. The disclosure shall be made to the CC as soon as possible after becoming aware of the violation.
2. The disclosure may be made only in the specified format (Whistle-blower Reporting Form) by email to whistleblower@hitachi-payments.com or by postal mail to the following address:
Compliance Committee
Hitachi Payment Services Pvt Ltd
Level 3, Silicon Towers, #23/1,
Velachery Tambaram Main Road,
Chennai 600 100
3. Measure of report is limited to postal mail or e-mail. Phone call or other oral notification may not be accepted.
4. The CC to which the disclosure has been made shall appropriately and expeditiously investigate all whistle-blower reports received.
5. In this regard, the Committee, if the circumstances so suggest, may appoint a senior officer or a committee of managerial personnel to investigate into the matter.
6. Identification of the Reporting Employee will be kept confidential by the CC.
7. Please note that anonymous disclosures will also be entertained. However, it may not be possible to interview the Whistle-blowers and grant him/her protection under the policy.

Measures to be taken upon report:

- CC will investigate and confirm the facts of the reported case.
- It is possible that the CC directly contacts the Reporting Employee for Investigation purpose.
- The reporting employee has a right to be informed of the outcome of the investigation.
- If any corrective action is required, CC will cause necessary measures to be taken.

Protection of the Reporting Employee.

1. HPY will not tolerate any act of retaliation against the Reporting Employee.
2. If the Reporting Employee is proved to be involved in the reported illegal act, he/she shall not be exempt from relevant responsibility.
3. If the investigation reveals that the charges were brought falsely and with malicious intent, the charging party may be subject to disciplinary action, including termination.

Retention of Documents

All Complaints received in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of seven years.

| Particulars | Description |
|--|---|
| Email | whistleblower@hitachi-payments.com |
| Postal Address (please mark as confidential) | Compliance Committee Hitachi Payment Services Pvt Ltd Level 3, Silicon Towers, #23/1, Velachery Tambaram Main Road, Chennai 600 100 |

Amendment

The Company reserves its 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 will be binding on the employees and directors unless the same is notified to the employees and directors.