

**QUICK CASHFLOW CAPITAL PRIVATE LIMITED****WHISTLEBLOWER POLICY**

(Pursuant to Section 177 of the Companies Act, 2013)

**REVIEW & APPROVING AUTHORITY**

Authority	Designation
Prepared by	Abhijeet K.Singh
Reviewed by	Alok Kedia
Approved by	Board of Directors
Version:	Version: V1.0
Approved On	09 <sup>th</sup> October 2025

## **1. Preamble**

Quick Cashflow Capital Private Limited ('QCF' or the 'Company') is committed to conducting business with the highest standards of ethics, integrity, transparency, and professionalism. This Policy provides a framework for Directors or employees, to raise concerns relating to illegal, unethical practices, fraud, misconduct, harassment, mis-selling, cyber incidents, or service deficiencies, without fear of retaliation.

## **2. Objectives**

- Provide a vigil mechanism for directors, employees to report genuine concerns.
- Protect whistleblowers and complainants from victimization or retaliation.
- Ensure fair, transparent, and time-bound redressal of customer complaints.
- Promote accountability, ethics, and customer-centricity within QCF.
- Ensure compliance with RBI Ombudsman Scheme and industry best practices.
- Strengthen transparency by publishing statistics in annual governance disclosures.

## **3. Applicability**

This Policy applies to:

- All employees, directors, and officers of QCF.

## **4. Definitions**

The terms such as 'Company', 'Audit Committee' and 'Board of Directors' refer to the relevant Company, Committee or Board of the Group Company adopting the policy, unless specified. The definitions of some key terms used in this Policy are mentioned below:

A. "Audit Committee" means the Audit Committee of the Board constituted by the Board of Directors of QCF in accordance with Section 177 of the Companies Act, 2013

B. "Employee" means every employee of the Company, including the whole time Directors of the Company.

C. "Protected Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity including leak of unpublished price sensitive information.

D. "Whistleblower" means Stakeholders including directors, individual employees and their representative bodies making a Protected Disclosure under this Policy.

E. "Investigators" mean those persons authorised, appointed, consulted or approached by the competent authority in connection with conducting investigation into Protected Disclosure.

## 5. Scope of the Policy

- Covered under Whistleblower Mechanism:
  - Fraud, corruption, bribery, financial irregularities.
  - Breach of contract, mis-selling, misrepresentation, or concealment of facts.
  - Violation of RBI guidelines, laws, or internal codes.
  - Harassment, discrimination, or victimization of employees or customers.
  - Cybersecurity incidents, manipulation of IT systems, or misuse of customer data.
  - Conduct which is an offence or a breach of law.
  - Accepting or seeking anything of material value from contractors, vendors, lenders, borrowers and persons providing services/ materials to the company in contravention of Company's Conduct, Discipline and Appeal Rules.
  - Other unethical conduct like gross misconduct, general malpractices etc
  - Disclosing confidential and proprietary information to outside parties.
  - Profiteering as a result of insider knowledge of company activities
  - Destruction, disposition, removal of records or any other assets of the Company with an ulterior motive to manipulate and misrepresent the facts so as to create suspicion/ suppression/ cheating as a result of which objective assessment/ decision would not be arrived at
- Concerns not covered under this Policy
  - Personal grievance
  - Dissatisfaction with appraisal and rewards
  - Customer grievance / Service-Related Queries
  - Any other matter which have already been addressed under the harassment, disciplinary or any other company procedures.

The relevant complaint will be referred to the concerned department.

The Nodal Officer will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action.

## 6. Guiding Principles

- Confidentiality: Identity of whistleblowers and complainants will be kept confidential, except as required by law.
- Anonymity: Provision for anonymous complaints with unique ID tracking.
- Non-Retaliation: No adverse action will be taken against persons reporting in good faith.

- Fair Process: All complaints will be investigated promptly, impartially, and with due process.
- Transparency: Customers will be informed of their rights, escalation process, and Ombudsman access.
- Accountability: Annual report of whistleblower & customer grievances to be placed before the Board and disclosed publicly.

## **7. Complaint Registration Mechanism**

- For Employees & Stakeholders:
  - Complaints may be sent in writing/email (signed by the Whistleblower and shall bear his name, employee number, designation where applicable and address)
  - Anonymous or pseudonymous disclosures shall not be entertained
  - Dedicated whistleblower hotline and mobile reporting channels will be available.
    - The Whistleblower should have the knowledge of the facts on which the disclosure is based and should disclose all available information about the existence of improper practice in the Company.
    - The disclosure shall be in a sealed envelope and addressed to the Nodal Officer or by way of an email on the designated email id. If the Whistleblower believes that there is a conflict of interest between Nodal Officer, he/she may make the disclosure directly to the Chairman, Audit Committee.
    - The contact details of the Nodal Officer for addressing and sending the Protected Disclosure is as follows:

Nodal Officer – Abhijeet K. Singh  
Quick Cashflow Capital Private Limited  
Smart Works, UG Floor, World Trade Tower, Noida Sector- 16, U.P 201301  
Email: [abhijeet.singh@qcfcapital.in](mailto:abhijeet.singh@qcfcapital.in)

Helpline Number: +91- 7880880878

Or In exceptional cases  
Chairman, Audit Committee  
Quick Cashflow Capital Private Limited

## **8. Investigation & Resolution**

- All disclosures will be investigated by Compliance/Risk teams under Audit Committee oversight.
- Investigations to be completed within 45 days.
- Corrective action plans and disciplinary recommendations will be reported to the Board.
- Independent reviews to ensure impartiality.

## **9. Protection to Whistleblowers**

- Whistleblowers acting in good faith will not face demotion, suspension, harassment, or discrimination.
- Malicious or false complaints may result in disciplinary/legal action.

## **10. Roles & Responsibilities**

- Board of Directors: Ensure overall oversight and approve reports.
- Audit Committee: Custodian of whistleblower complaints; supervise investigations.
- Nodal Officer: Responsible for customer grievance redressal and Ombudsman interface.
- Compliance Team: Maintain complaint register, conduct investigations, ensure regulatory reporting.
- Employees & Agents: Abide by policy and support investigations.
- Annual disclosures: Summary of complaints and resolutions published in governance reports.

## **11. Review & Disclosure**

- Policy reviewed annually or earlier in case of regulatory/operational changes.
- Approved by the Board of Directors.
- Policy and grievance channels will be publicly disclosed on the Company's website.

## **12. Grievance Redressal Contact**

Grievance Redressal Officer – Pradeep Kumar  
Quick Cashflow Capital Private Limited  
Smart Works, UG Floor, World Trade Tower, Noida Sector- 16, U.P 201301  
Email: [pradeep.kumar@qcfcapital.in](mailto:pradeep.kumar@qcfcapital.in)

Helpline Number: +91- 7880880878

## **13. Training & Awareness**

- The Whistleblower Policy shall be prominently displayed in office premises through posters containing reporting contacts, email ID, and committee details.
- A briefing on the Whistleblower Policy will form part of new employee induction/orientation.
- Annual training sessions shall be conducted for all employees and periodic awareness drives for customers.

## **14. Safe Harbour for Whistleblowers**

Whistleblowers who report concerns in good faith will be protected even if their allegations cannot be substantiated after investigation. No adverse action will be taken against such individuals.

## **15. Reporting & Disclosures Enhancement**

- A centralized and secure logbook/database of all complaints, actions taken, and closure status will be maintained.
- Quarterly reports on whistleblower and customer protection complaints shall be submitted to the Audit Committee.

## **16. Conflict of Interest in Investigations**

All investigators must declare any conflict of interest prior to engaging in an investigation. Where conflicts exist, alternate investigators will be appointed.

## **17. Independent Third-party Investigations**

In cases involving sensitive issues, high-value allegations, or potential conflicts of interest, the Company may engage independent external professionals to conduct investigations.

## **18. Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal the Whistleblower's identity. At the appropriate time, however, the Whistleblower might need to come forward as a witness.

Please note that:

- An employee must believe the disclosure of information is in the interest of the Company / its stakeholders / public.
- Staff must not act maliciously or make false allegations.
- Staff must not seek any personal gain.
- No unfair treatment will be meted out to a Whistleblower by virtue of his/her having reported a Protected Disclosure under this Policy.

The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistleblowers.



## **19. Policy Accessibility**

The Whistleblower & Customer Protection Policy shall be made available across multiple platforms – company intranet, website, induction packs, and prominently displayed in office premises.

## **20. Timelines Flexibility**

Investigations will generally be completed within 45 days. In complex matters, this period may be extended up to 90 days with Audit Committee approval.

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