

CANARA ROBECO ASSET MANAGEMENT COMPANY LIMITED

WHISTLE BLOWER POLICY

HISTORY LOG

Version	Date	Changed By	Short description modification	Next Review
1.1	1.04.2012	Jignesh Modi	Policy as per Robeco format is implemented.	-
1.2	1.01.2015	Jignesh Modi	(1)Change of contact person at Group level (clause 1 of the policy) (2)Annual Review clause	January 2016
1.3	Feb 2017	Ashutosh Vaidya	No Change	Feb 2018
1.4	July 2020	Ashutosh Vaidya	Updation of contact person at Group	July 2021
1.5	Oct 2024	Akshata Shenoy	<ul style="list-style-type: none"> • Various changes arising out of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2022 dated November 24, 2022 (effective from Nov 1, 2024). • Changes arising out of SEBI circular No. SEBI/HO/IMD/ IMD-PoD-1/P/CIR/2024 /107 dated August 05, 2024 on 'Institutional Mechanism for identification and deterrence of market abuse'. • Other data updation related / logical / minor changes. 	Oct 2025
1.6	January 2026	Akshata Shenoy and Ashutosh Vaidya	a. The Whistle Blower Policy framed under the SEBI (Listing Obligation and Disclosure Requirement), Regulations, 2015 and the Whistle Blowing Policy framed under SEBI (Mutual Funds) Regulations, 1996 and circulars and guidelines issued thereunder have been merged into a single Policy document to have provisions relating to Whistle Blowing under all applicable Laws and Regulations in one document.	January 2027 or change in regulations whichever is earlier.

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			b. Since the Policy is arising from a regulatory requirement and is a Board approved Policy, the section on Annual Review has been updated to specify that the updated policy post annual review shall be placed before the Audit Committee and Board of Directors of the AMC and Trustee Company for approval.	

1. INTRODUCTION

- 1.1.** As per Section 177(9) of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014, and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, every listed company is under an obligation to formulate a vigil mechanism or a whistle blower policy to enable directors and employees to report genuine concerns. Further, in accordance with Regulation 25(29) of the SEBI (Mutual Funds) Regulations, 1996 read with SEBI Circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/107 dated August 05, 2024 and AMFI Communication no. 35P/MEM-COR/52/2024-25 dated August 20, 2024, the asset management companies are required to establish, implement and maintain a documented whistle blower Policy that shall provide for a confidential channel for employees, directors, trustees, and other stakeholders to raise concerns about suspected fraudulent, unfair or unethical practices and violations of regulatory or legal requirements or governance vulnerability, and establish procedures to ensure adequate protection of the whistle blowers. Further, the said Policy should be easily accessible and available to all the stakeholders at all times. Additionally, Regulation 9A(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**SEBI PIT Regulations**”) also requires listed companies to maintain a Whistle Blower Policy and ensure that employees are made aware of it, enabling them to report instances of leakage of unpublished price-sensitive information (“**UPSI**”) related to the Company or its securities. Similarly, Regulation 5H(5) of SEBI PIT Regulations, mandates that an asset management company for a mutual fund, with the approval of the trustees, must establish a Whistle Blower Policy and bring it to the attention of employees, facilitating the reporting of instances of leakage of UPSI.
- 1.2.** In this context, this Whistle Blower Policy (“**Policy**”) has been prepared to encourage employees, directors and other stakeholders to report concerns without any fear of retaliation and provide a framework for appropriate investigation and redressal of such concerns.

2. OBJECTIVE

- 2.1.** Canara Robeco Asset Management Company Limited (“**Company**”) is committed towards adopting high ethical standards and conducting its affairs with absolute integrity and professionalism. Through this Policy, the Company endeavors to promote a non-threatening environment and transparent culture where concerns against malpractices and/or alleged violations of the Code of Conduct, including violations of applicable laws are freely expressed and good governance practices are reinforced. With this objective in mind, this Policy provides adequate safeguards against any form of

victimization or retaliation faced for using this mechanism to report concerns and/or alleged violations of the Code of Conduct, including violations of applicable laws. Nothing in this Policy is intended to limit any protections provided to Whistle Blowers by any applicable laws or regulations, or to place any limits on a Whistle Blower's ability to communicate with government, administrative, or law enforcement authorities, as provided for by law.

3. SCOPE

- 3.1. This Policy shall cover concerns or complaints by Employees, Directors, Trustees and other stakeholders relating to Reportable Matters. This Policy outlines the procedure for making a Protected Disclosure.
- 3.2. This Policy shall not extend to concerns or complaints relating to vague, incoherent, irrelevant, speculative, vexatious or frivolous information, or information rendered solely for the purpose of malicious prosecution or exclusively derived from allegations made in ongoing judicial, quasi-judicial, administrative or disciplinary proceedings, or matters related to customer service/grievances.

4. APPLICABILITY & CONSTRUCTION

- 4.1. This Policy is applicable to Employees, Directors, Trustees, and other Stakeholders such as actual and potential clients, unit holders, shareholders, vendors, suppliers, business contacts, customers, contractors, consultants, lenders, borrowers, service providers, brokers, distributors, intermediaries, representatives, subcontractors, agents, advisors and government & public bodies (including their advisors, representatives and officials) as the Company is in the mutual fund business; however, since the Company's equity shares are listed on the stock exchanges, this Policy shall also be applicable for being a listed Company effective from the date of listing of equity shares of the Company on the Stock Exchanges.

For better understanding, the clauses of this Policy which are specifically applicable to the listed equity shares of the Company are referred as "**Canara Robeco AMC**" and the clauses which are specifically applicable for mutual fund business are referred as "**Canara Robeco Mutual Fund**". Any clause(s) in which "**Canara Robeco AMC**" or "**Canara Robeco Mutual Fund**" is not mentioned specifically, that clause(s) is/are applicable to listed equity shares of the Company as well as mutual fund business of the Company.

- 4.2.** The provisions of this section are to be read in conjunction with the above provisions and any existing Policy of the Company which deals with complaints such as financial or operational mismanagement / irregularities, preferential treatment to certain stakeholders, conflict of interest, violation of legal or regulatory provisions, *etc.*, or in respect of employee misconduct such as bribery and corruption, management instances of unethical behavior, fraud or violation of any code of ethics or code of conduct.
- 4.3.** The provisions of this section would be supplementary to the above provisions and to any other Policy of the Company, *i.e.*, to the extent the provisions of this section are inconsistent with any other provisions in this Policy or with any other Policy, insofar as an actual or suspected Leakage of UPSI is concerned, the provisions of this section will have an overriding effect.

5. DEFINITIONS

For the purpose of this Policy, unless the context otherwise requires, the following words and expressions shall have the meanings assigned herein. Words and expressions used and not defined in this Policy but defined in other policies or applicable laws shall have the meanings respectively assigned to them under the respective policies or applicable laws.

5.1. Audit Committee

Audit Committee means the Committee constituted by the Board of Directors of the Company in accordance with Section 177 of Companies Act, 2013 and read with Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any other applicable laws.

5.2. Code of Conduct

Code of Conduct means and includes the general business principles and Code of Conduct.

5.3. Whistle Blower

Whistle Blower shall mean Employees Directors Trustees, and other Stakeholders such as actual and potential clients, unit holders, shareholders, vendors, suppliers, business contacts, customers, contractors, consultants, lenders, borrowers, service providers, brokers, distributors, intermediaries, representatives, subcontractors, agents, advisors and government & public bodies (including their advisors, representatives and officials) as the Company is in the mutual fund business who makes a Protected Disclosure under this Policy.

5.4. The Committee of Ombudsperson

The Ombudsperson will be a person, including a full-time senior employee, who is well respected for his/her integrity, independence and fairness.

The Audit Committee, in consultation with the Board, shall approve the constitution of the Committee of Ombudsperson (s), authorized to receive all Protected Disclosure under this Policy and ensure appropriate action is taken.

Ombudsperson Committee shall comprise the following:

1. Head - Human Resources
2. Company Secretary
3. Chief Compliance Officer

5.5. Employee

"Employee" means any person who is employed or engaged with the Company and CRMF Trustee Private Limited, whether working in India or abroad, and shall include the Directors in the employment of Canara Robeco.

5.6. **"Person Involved"** means the Employee that is suspected to have committed or facilitated or to intended to commit or facilitate a Suspected Irregularity.

5.7. Protected Disclosure

"Protected Disclosure" means the disclosure of a Reportable Matter in accordance with this Policy.

5.8. **"Reportable Matter"** means a genuine concern concerning actual or suspected:

- i. fraudulent, unfair or unethical practices, such as improperly tampering with Company's books and records, or theft of company property, violations of regulatory or legal requirements or governance vulnerability;
- ii. corruption, including bribery and money laundering;
- iii. breaches of the Code of Conduct;
- iv. violation of the Company's policies;

- v. willful data breaches and unauthorized disclosure of confidential or proprietary data, including communication of UPSI, insider trading or front-running.
- vi. an (imminent) violation of laws and regulations;
- vii. an (imminent) criminal offence;
- viii. an (imminent) intentional provision of incorrect information to public bodies;
- ix. facts that can directly or indirectly damage the good name of Canara Robeco in some way.
- x. an (imminent) intentional suppression, destruction or manipulation of information regarding the facts in connection with any of the irregularities mentioned herein above;

The above list is illustrative and should not be considered as exhaustive.

5.9. Unpublished price sensitive information (“UPSI”) for Schemes of Canara Robeco Mutual Fund means any information, pertaining to a scheme of Canara Robeco Mutual Fund which is not yet generally available and which upon becoming generally available, is likely to materially impact the net asset value (“NAV”) or materially affect the interest of unit holders, including but not restricted to the following:

- a. change in the accounting policy;
- b. a material change in the valuation of any asset or class of assets;
- c. restrictions on redemptions, winding up of scheme(s);
- d. creation of segregated portfolio;
- e. the triggering of the swing pricing framework and the applicability of the swing factor;
- f. material change in the liquidity position of the concerned scheme(s) of the Mutual Fund; and
- g. default in the underlying securities which is material to the concerned scheme(s) of the Mutual Fund.

5.10. Unpublished price sensitive information (“UPSI”) for Canara Robeco AMC shall have the same meaning as defined in Regulation 2 (n) of SEBI PIT Regulations.

5.11. Leakage of UPSI for schemes of Canara Robeco Mutual Fund shall have the same meaning as ascribed to it in the Policy on dealing with Leakage or Suspected Leakage of UPSI of Schemes of Canara Robeco Mutual Fund.

5.12. Leakage of UPSI for Canara Robeco AMC means unauthorised transfer of UPSI in relation to Canara Robeco AMC *i.e.* except in furtherance of Legitimate Purposes, by any person, who is in possession of UPSI, to any other person, directly or indirectly, overtly or covertly or in any manner whatsoever.

5.13. Legitimate Purpose for Canara Robeco Mutual Fund shall have the same meaning as ascribed to it in the Policy on Determination of Legitimate Purpose of Schemes of Canara Robeco Mutual Fund.

5.14. Legitimate Purpose for Canara Robeco AMC shall have the same meaning as ascribed to it in the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

6. REPORTING MECHANISM

6.1. Protected Disclosures under this Policy shall be made in accordance with the mechanism set out below:

- (a) Protected Disclosures shall be made in writing by way of an email addressed to the contact information of the Committee of Ombudsperson(s) provided in **Annexure I**.
- (b) If for any reason the Whistle Blower is not comfortable making a Protected Disclosure in terms of (a) above or in appropriate or exceptional cases, a Protected Disclosure may also be addressed to the Chairperson of the Audit Committee at whistleblower@canararobeco.com.
- (c) The receipt of Protected Disclosure shall be acknowledged by the concerned recipient.
- (d) Protected Disclosure should mandatorily contain the name, designation, division/department and contact information of the Whistle Blower.
- (e) Anonymous or pseudonymous Protected Disclosure shall not ordinarily be accepted unless the Ombudsperson(s) deems it fit to investigate the Protected Disclosure, if the concerns highlighted are serious or grave in nature.
- (f) The Whistle Blower must specifically identify the individual in respect of whom the concern has been raised in the Protected Disclosure.

- (g) Protected Disclosures shall be factual and specific in nature, to the extent practicable, and based on information derived from Whistle Blower's own knowledge. The Protected Disclosure must demonstrate sufficient grounds for concern and shall be accompanied by supporting documents/evidences, if any. As far as possible, Protected Disclosures must ensure the accuracy of the information provided, however he/she is not obligated to prove the truth of the allegations.
- (h) The Ombudsperson(s) may require the Whistle Blower to appear in person to ascertain his/her identity and the veracity of the information provided.

7. Specific provisions relating to SEBI circular on Market Abuse for Canara Robeco Mutual Fund:

In order to address instances of market abuse including front running and fraudulent transactions in securities, SEBI has, *vide* Regulation 25(27) of the SEBI (Mutual Funds) Regulations, 1996 and the SEBI Circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/107 dated August 5, 2024, prescribed that Asset Management Companies (AMCs) shall put in place an institutional mechanism for identification and deterrence of potential market abuse including front-running and fraudulent transactions in securities.

Any Whistle Blowing complaints related to market abuse will be covered under the provisions of this policy.

8. Specific provisions relating to SEBI (Prohibition of Insider Trading) Regulations, 2015 for Schemes of Canara Robeco Mutual Fund:

The Company has robust institutional mechanisms in place for the prevention of insider trading, including a policy on dealing with leakage/suspected leakage of UPSI of the Schemes of Canara Robeco Mutual Fund ("Suspected Leakage Policy"). The Suspected Leakage Policy, *inter alia*, sets out the policies and procedures for inquiry in case of an actual or a suspected leakage of UPSI relating to Schemes of Canara Robeco Mutual Fund, and other concomitant measures as prescribed in law.

The institutional mechanisms for the prevention of insider trading are governed by and subject to the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") as amended from time to time and the Personal Securities Trading Policy ("PST Policy").

These provisions have been inserted in terms of Regulation 5H (5) of the Regulations in order to ensure that the employees have a clear and predeterminate procedure for reporting of any actual or suspected leak of UPSI, and are duly protected once such leakage is suspected or has taken place.

(a) Process for reporting any actual or suspected Leakage of UPSI

A Whistleblower can report one or more instance of an actual or suspected Leak of UPSI relating to the Schemes of Canara Robeco Mutual Fund in a manner as prescribed in this Policy.

9. INVESTIGATION

- 9.1.** On receipt of a Protected Disclosure, the Ombudsperson(s) must not forward the mail or share it with any other person.
- 9.2.** Protected Disclosures received under this Policy, if prima facie found to contain verifiable information, shall be promptly investigated by the Committee of Ombudsperson(s) or by a Sub-committee constituted by the Committee of Ombudsperson(s) in this regard. The investigation shall be in the nature of a fact-finding inquiry, without the presumption of guilt, and may involve calling for information or seeking assistance from other departments / divisions, if needed. In case the Ombudsperson(s) is of the view that a Protected Disclosure reported has no basis, it shall not be pursued and the said decision, along with the rationale, shall be appropriately documented.
- 9.3.** Protected Disclosures reported against any Ombudsperson and the CEO shall be investigated and decided by the Managing Director & CEO and the Audit Committee, respectively.
- 9.4.** The investigation should ideally be completed within a timeframe of two months from the receipt of verified protected disclosure. In the event the same is not feasible, an extension must be sought from the Audit Committee after providing the tentative date of completion.
- 9.5.** Members against whom a Protected Disclosure has been made shall be informed of the allegations on the commencement of the investigation process unless there is substantial risk that such notification to the Person Involved would jeopardize the ability of the company to effectively investigate the Reported Matter or gather the necessary evidence. In the event, the Person Involved cannot be informed immediately, he/ she/ they will be informed as soon as the risk ceases to exist. The Ombudsperson(s), may at his/her/their discretion, allow such members to respond to the allegations raised against them.
- 9.6.** All officials of the Company or people connected with the Protected Disclosure shall fully cooperate with the Ombudsperson(s) during the investigation process. Failing to cooperate or deliberately providing false information may be the basis for disciplinary action.

9.7. On completion of the investigation, the observations and findings, along with supporting material (if any), shall be recorded in the form of a preliminary report. In case investigation is conducted by a Committee appointed by the Ombudsperson(s), the report shall be furnished to the Ombudsperson(s) for the purpose of arriving at a decision.

10. DECISION

10.1. Pursuant to the investigation, if the Ombudsperson(s) is of the opinion that a violation of applicable laws, the Company's policies or any other matter as hereinabove stated in any clause of this Policy, has been committed, the Ombudsperson(s) shall submit a preliminary report containing observations and findings, along with any supporting material, to the Managing Director & CEO for further action. The Managing Director & CEO shall thoroughly examine the report and, in consultation with the Ombudsperson(s), determine an appropriate course of action, which shall be reflected in the final report. The minutes of all deliberations between the Managing Director & CEO and the Ombudsperson(s) shall be duly recorded.

10.2. However, if the Managing Director & CEO is the subject of the Protected Disclosure, or if there is a potential conflict of interest, the Ombudsperson(s) shall escalate the matter directly to the Audit Committee. In such cases, the Audit Committee shall have full authority to review the investigation report, make a final determination, and decide on the necessary disciplinary or corrective action. The decision of the Audit Committee shall be final and binding.

10.3. Disciplinary or corrective action that may be taken pursuant to an investigation, may include a verbal warning, temporary suspension, withholding of promotion, demotion, recovery of financial loss incurred, reduction in compensation, voluntary resignation or termination of employment, consistent with applicable law. In case of suspected violations, corrective measures to prevent the occurrence of violations set out in this Clause may also be taken.

10.4. The final outcome of the investigation shall be communicated to the officials of the Company or people connected with the Protected Disclosure against whom the Protected Disclosure has been made, as far as reasonably practical. The final outcome of the investigation shall also be communicated to the Audit Committee immediately at its next meeting.

11. PROTECTION AGAINST RETALIATION(#)

- 11.1.** The Whistle Blower's identity shall be kept confidential during and after the conclusion of the investigation, to the extent possible and permitted under law, unless required to be disclosed in connection with any legal or regulatory proceedings or requirements of applicable law (#).
- 11.2.** No adverse action, unfair treatment, discrimination, harassment, termination, demotion, suspension, threats, victimization or any form of retaliation shall be meted out to the Whistle Blower by virtue of having made a Protected Disclosure under this Policy.
- 11.3.** Whistle Blowers who face any such adverse consequences are encouraged to intimate the same to the Audit Committee on an immediate basis. Any such retaliation may constitute grounds for punitive action, including the dismissal of the members who indulge in said behavior.
- 11.4.** Protection under this Policy does not mean protection from any action arising out of false or bogus allegations made by a Whistle Blower in the Protected Disclosure knowing it to be false or bogus or with a bad faith intention, or such actions related to or arising from any event/incident or matter totally unconnected with the Protected Disclosure. Further, any abuse of protection under this policy will warrant appropriate action.
- 11.5.** The use in good faith of the Policy, even if the facts later turn out to be inaccurate or do not trigger any particular further action, shall not expose the Reporting Employee to sanctions and shall further not affect his position in any way.

12. OBLIGATIONS OF THE OMBUDSPERSON

- 12.1.** The Ombudsperson(s) shall carry out the duties set out under this Policy in a diligent manner, and shall be obligated to:
 - (a) Manage the sensitivities of the individual seeking clarifications or reporting a concern under the Policy.
 - (b) Ensure the adherence to safeguards and protections put in place for a Whistle Blower.
 - (c) Ensure that Protected Disclosures are investigated and acted upon within the stipulated time frame.
 - (d) Conduct the investigation in a fair, transparent and strictly confidential manner and recommend action based on an objective evaluation of the preliminary report.

(e) Recuse himself/herself from matters, in case of any conflict or inconsistency between personal and the Company's interests.

12.2. The Ombudsperson shall keep the Report confidential. Information relating to the Report shall only be provided to those persons within the Company who have a need to know such information to execute their tasks under this Policy, to perform the investigation and any action taken in consequence of the Report. Information relating to the Report shall only be provided to persons within other departments if such disclosure emanates from the Company. The information shall further be provided in such a manner as to safeguard as much as possible the confidentiality of the identity of the Reporting Employee. Information (indirectly) revealing the identity of the Reporting Employee shall only be provided if such is indispensable for the investigation of the Suspected Irregularity or subsequent judicial proceedings.

13. ROLE OF A WHISTLEBLOWER

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 a given case. In the event that the Whistleblower has reasonable grounds for knowing or suspecting, that there has been a Leakage of UPSI for Canara Robeco Mutual Fund or Canara Robeco AMC, he/she must promptly report the same in the manner prescribed in this Policy. A Whistleblower should not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by Ombudsperson.

The Company expects that a Whistleblower will maintain as confidential any information provided to the Whistleblower by Employees during investigation or of which the Whistleblower becomes aware because of the Whistleblower's ongoing participation in the investigation.

14. REVIEW OF DECISIONS

14.1. Any member aggrieved by the outcome of investigation under this Policy may request for a review of the decision. Such review must be requested within 5 working days from the date the decision is communicated and shall be undertaken by the Audit Committee. While the review process is underway, the action or penalty imposed by the Managing Director & CEO or the Audit Committee shall not take effect.

14.2. A decision shall only be accepted for review, wherein the aggrieved member is able to:

- (a) Present new or additional evidence; and/or additional information about her/his personal circumstances; or
- (b) Present evidence of procedural irregularity; or
- (c) Demonstrate that a penalty imposed is disproportionate to the breach; or
- (d) Demonstrate that the financial penalty is based on an inaccurate valuation.

14.3. The Audit Committee shall be entitled to question the aggrieved person on the content of any statements or documents presented during the review process.

14.4. If the aggrieved person fails to make an appearance without just cause at a meeting called by the Audit Committee, the request for review may be immediately dismissed or dealt in a manner deemed fit by the latter.

14.5. The decision of the Audit Committee shall be final and binding.

15. Protection of personal Data:

- i. The person who is in possession of personal data (“the access person”) will only process for Legitimate Purpose or for performance of duties or discharge of legal obligations. ‘Legitimate Purpose’ shall have the same meaning as ascribed to it in the ‘Policy on Determination of Legitimate Purpose– for the Schemes of Canara Robeco Mutual Fund’.
- ii. The access person will take the necessary technical and organizational measures to adequately safeguard the Personal Data against loss or unauthorized access. The Personal Data may be collected by any data processing means, whether electronic or not. These means shall in all events be solely dedicated to the Rules, i.e. the Personal Data shall in all cases be processed separately from other Employee information systems or Employee files.
- iii. Personal Data relating to Reports that have been found unsubstantiated shall be removed forthwith. Data relating to Reports about substantiated Suspected Irregularities will be removed within two months after the verification work is completed, unless disciplinary action is taken or court proceedings are filed against the Person Involved or the Reporting Employee filed a report in bad faith. "Remove" means destruction of the Personal Data or adaptation of the Personal Data in such a way that identification of the Person Involved and the Reporting Employee are no longer possible. After the aforementioned storage periods are lapsed, the Personal Data may only be kept for archiving and statistical purposes in accordance with applicable national laws.

- iv. Without prejudice to the other information requirements under this Policy:
 - This Policy shall be made available to the Employees of the Company by uploading on the Company's website or by other means which allow Employees to easily access its content.
- v. The Person Involved has a right to object to the processing of Personal Data in relation to a Report on compelling legitimate grounds relating to his particular situation.
- vi. Replies to a request for access, correction or removal shall be provided as soon as reasonably practicable as but no later than 4 weeks. Any refusal shall be in writing and shall mention the reasons, therefore.
- vii. There may be Disclosure of Personal Data to a person or legal entity if the same is on account of any regulatory order.

16. RECORD KEEPING AND RETENTION

- 16.1.** The Ombudsperson(s) shall maintain a record of all Protected Disclosures reported under this Policy, irrespective of whether or not investigation has been initiated against the same.
- 16.2.** All records in respect of Protected Disclosures under this Policy shall adhere to the norms set out in the Policy on Preservation and Archival of Documents and Records.

17. AMENDMENTS AND REVIEW OF THE POLICY

- 17.1.** The Policy shall be reviewed at least once annually or as and when there are any amendments in the applicable regulations. If at any point, there arises any instance of conflict between the Policy and any applicable regulations governing whistleblower policies, the applicable regulations shall prevail over the provisions hereunder and this Policy shall stand amended so that it complies with applicable laws from the effective date of the change in applicable laws. The updated Policy shall be placed before the Audit Committee and Board of Directors of AMC and Trustee Company for their approval.

18. MONITORING AND REVIEW

The Audit Committee shall review the Protected Disclosures reported under this Policy, and the outcome of investigation, if applicable, on a quarterly basis.

ANNEXURE I
Ombudsperson Network and Contact Information

Sr. No.	Designation	Contact details	E-mail Id
1.	Head - Human Resources	022 6658 5026	upasna.saboo@canararobeco.com
2.	Company Secretary	022 6658 5052	ashutosh.vaidya@canararobeco.com
3.	Chief Compliance Officer	022 6658 5006	akshata.shenoy@canararobeco.com