



WHISTLE BLOWER POLICY

Enam Asset Management Co. Pvt. Ltd.

SEBI Regd. Portfolio Manager: Regn. No. INP00000225
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(ENAM Asset Management Co. Pvt. Ltd. is not registered with SEBI as a Mutual Fund)

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Overview

ENAM Asset Management Company Private Limited (the “company”) believes and is committed to conduct of the affairs of its constituents in a fair and transparent manner by adopting highest business, governance, ethical and legal standards.

The back bone of our ethos includes trust, integrity and doing the things right. The policy enables each employee to bring to the notice of the Company any unethical practice/ breach of the Company policy and interaction with internal and external customers

Definitions

Company – means ENAM Asset Management company private Limited

Disciplinary Action – means any action that can be taken on the completion of / during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter

Employees – every employee of the company including directors

Policy – means the Whistle-blower policy

Protected Disclosure – disclosure of reportable matter where concern have been raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity

Reportable matter – as described in the policy

Subject – means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation

Whistle-blower – someone who makes a Protected Disclosure of the reportable under this policy

Objective

The objective of the policy is to set out the procedure to be followed to report the instances covered under the policy. It provides a framework to promote responsible and secure whistle blowing. It protects and provides adequate safeguards to employees wishing to make a protected disclosure about irregularities in the company.

The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

Scope of Policy

The policy is applicable to all the employees and other stakeholders such as vendors, partners, distributors, brokers etc.

Coverage of Policy

The Reportable matter under the policy includes concern concerning actual or suspected:

- Breach of any law, statute, policy or any applicable regulation
- Fraudulent practices such as issues relating to accounting policies and process, theft of company property, corruption including bribery and money laundering, Insider trading, sharing of confidential information etc.
- Acts relating to financial loss or reputation
- Dangerous practice(s) likely to cause physical harm/damage to any person/property
- Abuse of power or authority for any unauthorized or ulterior purpose
- Unfair discrimination, coercion, harassment in the course of employment or provision of services

The list is only illustrative and not exhaustive and shall include other acts pertaining to breach of policy / misappropriation etc.

Responsibility to report

Whistle-blower should, before making a complaint under this policy, reasonably believe in good faith that there exists sufficient reason or ground to make such complaint.

Since Whistle-blower by nature is considered as confidential and that the complainant wishes to be treated confidentially/any complaint when copied/cced are marked to other functions, the same will be considered to be a general complaint and will be treated accordingly.

Protected matter has to be made whenever an employee becomes aware of a Reportable Matter. The Protected Disclosure should be made promptly upon the Employee becoming aware of the Reportable Matter. Reportable Matters should be made pursuant to the reporting mechanism described in this policy.

The Whistle-blower is limited to making a Protected Disclosure. A Whistle-blower should not engage in investigations concerning a Reportable Matter that is the subject of a Protected Disclosure. Neither should a Whistle-blower become involved in determining the appropriate corrective action that might follow from the submission of a Protected Disclosure.

Disqualifications

While it will be ensured that genuine Whistle-blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.

Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle-blower knowing it to be false or bogus or with a mala fide intention.

Company reserves the right to take disciplinary action in accordance to the company's rules and policies wherein Whistle-blower, who make three or more Protected Disclosures in a year, which have been subsequently found to be mala fide, frivolous, baseless, malicious or reported otherwise than in good faith.

Reporting Mechanism

The employee can make a protected disclosure in writing through a letter or can send the email to the designated person outlined in this policy and the contact details are as below:

Contact Details:

Founder
ENAM Asset Management Company Private Ltd.
810, Raheja Chambers,
Free Press Journal Marg,
Nariman Point,
Mumbai – 400021.
E-mail: jjien.doshi@enamamc.com

Protected disclosure against the designated person should be addressed to the board as listed below:

Contact Details:

Independent Directors
Board of Directors,
ENAM Asset Management Company Private Ltd.
810, Raheja Chambers,
Free Press Journal Marg,
Nariman Point,
Mumbai – 400021.
E-mail: independentdirectors@enamamc.com

Anonymous Access

Whistle-blowers are encouraged to disclose their identity when making protected disclosure. However, if the Whistle-blower only feels able or comfortable to report a Concern if made anonymously, then the Whistle-blower can report the Concern Anonymously.

Company and its Employee as defined in the policy, including designated person, must never attempt to discover the identity of a Whistle-blower who has chosen to make a protected disclosure anonymously.

Role of Whistle-blower

To enable the proper investigation on reportable matter, before making the protected disclosure, the employee has to ascertain that a violation has actually occurred and that the act or the omission is not based on what can be termed as a normal business decision.

Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.

Investigation

To enable further proper investigation of Reportable Matter, Whistle-blowers are strongly encouraged to provide their name and contact details whenever they make a Protected Disclosure under this Policy.

If a Whistle-blower does not provide his or her name and contact details when making a Protected Disclosure, companies' ability to investigate the subject-matter of the Protected Disclosure may be limited by its inability to contact the Whistle-blower to obtain further information.

If initial enquiries of the Reportable matter indicate that the concern has no basis, or it is not a matter to be investigation pursued under this Policy, it may be dismissed at this stage and the decision is documented.

The investigation will:

- subscribe to the principles of natural justice i.e. a person is not to be a judge in his own case and opportunity of being heard is to be given to the subject;
- have a duty of fairness, objectivity, thoroughness, ethical behaviour, and observance of legal and professional standards
- keep records together with supporting evidencing documents; and
- be done expeditiously resulting into a report clearly stating findings and recommending the remedial action.

Unless there are compelling reasons not to do so, Subjects will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is evidence in support of the allegation. Subjects have a right to be informed of the outcome of the investigation.

Decision

If an investigation leads to conclude that an improper or unethical act has been committed, the Company would take such necessary disciplinary or corrective action as it deems fit.

It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

Role of Subject

An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action.

- Subjects have a duty to co-operate with the Management or any of the investigators during investigation to the extent that such co-operation sought does not merely require them to admit guilt;
- Subjects will normally be informed of the allegations at the outset of formal investigation and have opportunities for input during the investigation;
- Subjects have right to consult with a person of their choice, save and except the investigators and/ or members and/or the Whistle-blower;
- Subjects have a responsibility not to interfere with the investigation and to adhere to the directives from the investigators in this regard. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated in any manner;
- Subjects have the right to be informed of the outcome of the investigation.

Protection to Whistle-blower

If a Whistle-blower does provide his or her name when making a Protected Disclosure, company will treat as confidential the identity of the Whistle-Blower and the fact that a Protected Disclosure has been made, except as otherwise required by law and to the extent possible while allowing an investigation to proceed

A Whistle-blower may make a Protected Disclosure without fear of retaliation or intimidation. The Company believes a strong and effective “Whistle-blower Policy” constitute an essential part of its business principles and prohibits its Employees from engaging in retaliation, intimidation any kind of discrimination, harassment, victimization or any other unfair employment practice that is directed

against a Whistle-blower. Employees who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, which may include dismissal.

Complete protection will, therefore, be given to Whistle-blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour or the like including any direct or indirect use of authority to obstruct the Whistle-blower's right to continue to perform his duties/functions including making further Protected Disclosure.

Thus, if the Whistle-blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle-blower to receive advice about the procedure, etc.

Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle-blower.

Secrecy & Confidentiality

The Whistle-blower, the Subject, the designated person and everyone involved in the process shall:

- maintain complete confidentiality/ secrecy of the matter
- not discuss the matter in any informal/social gatherings/ meetings etc.
- discuss only to the extent or with the persons required for the purpose of completing the process and investigations
- not keep the papers unattended anywhere at any time
- keep the electronic mails/files under password to the extent possible

If anyone is found not complying with the above, he/ she shall be held liable for such disciplinary action as is considered fit.

Record Keeping and Ownership

Compliance and Risk department will own this policy.

The designated person under reporting mechanism will:

- Accept all complaints appearing prima facie of substance;
- Not reject any complaint prima facie of substance
- May chose to forward or designate for assistance from risk or compliance division, if required
- Would put up such cases and findings to the board.

If designated person under reporting mechanism has not forwarded/sought any assistance from policy owner it will be the responsibility of the designated person to preserve all the records along with investigation findings, recommendation, action/conclusion etc. as applicable.

Changes or Review of the policy

The policy owners on behalf of the Company reserves the right to amend or modify this policy in whole or in parts, at any time without assigning any reason whatsoever. However, this policy will not be binding on the employees unless the same is communicated to the employees. Further policy will not be binding if modification and amendments are not communicated to employees.
