

EXCERPTS OF WHISTLE BLOWER POLICY

ICICI Securities Limited (Company) has established its Whistle Blower Policy (the Policy) for employees so that they can raise concerns/issues, if any, which they have on the following or possibilities/apprehensions of:

- Breach of any law, statute or regulation by the Company;
- Issues related to accounting policies and procedures adopted for any area or item.
- Acts resulting in financial loss or loss of reputation.
- Misuse of office, suspected/actual fraud and criminal offences.

ADMINISTRATION OF THE POLICY:

The employees may send the concerns in writing to the Chairperson, Audit Committee / the Head - Compliance & Legal Group of the Company through a letter at ICICI Securities Limited, ICICI Venture House, Appasaheb Marathe Marg, Prabhadevi, Mumbai – 400025 or by way of email marked to chairperson.auditcommittee@icicisecurities.com or whistleblower@icicisecurities.com or record a concern in the Whistle Blower System which can be accessed on Universe > Quick Links > Whistle Blower Policy.

The Head - Compliance & Legal Group will get the concerns investigated and brief the audit committee on a quarterly basis. The Head - Compliance & Legal Group shall lay down various guidelines for implementation of the Policy including record keeping and dissemination of information about the Policy.

PROTECTION TO EMPLOYEES:

Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee discloses his/her identity, discloses the information in good faith, believes it to be substantially true, does not act maliciously nor makes false allegations and does not seek any personal or financial gain.

The Company strictly prohibits any attempt of retaliation by anyone against any employee who raises a concern under the policy in good faith.

Any Employee who has been subject to victimization for use of this mechanism may communicate their concern by writing to the Chairperson, Audit Committee or the Head - Compliance & Legal Group of the Company.

Any infractions of the Code of Conduct of the Company by the complainant after raising the complaint may invalidate the protection provided under this Policy.

Nothing in this Policy precludes or is intended to preclude a complainant from seeking a monetary award from a government, administrative, or law enforcement authority, as provided for by law.