

SOCIETE GENERALE INDIA

Policy on Protected Disclosure Scheme

[Compliance]

| DOCUMENT CONTROL | |
|--|---|
| Type of Document | : <input type="checkbox"/> Framework / <input checked="" type="checkbox"/> Policy / <input type="checkbox"/> Procedure |
| Scope | : <input checked="" type="checkbox"/> All Staff <input type="checkbox"/> HODs <input type="checkbox"/> DEPT/BRANCH_____ |
| Document Reference | : P#0106 |
| Effective Date | : 1 st April 2023 |
| Cancel & Supersedes | : NA |
| Local sponsor, Dept. | : Katan Hirachand |
| Regional Sponsor, if any | : NA |
| Author / Project Manager | : Shashank MAHAJAN |
| Approved by | : |
| (1) Interim Chief Executive & Chief Country Officer and Head of Markets, SG Bank India | Katan Hirachand |
| (2) Chief Operating Officer | Priscilla RODRIGUES |
| Committee Approval, if any | : Apex Committee dated |

| (Signatures) | (Signatures) | (Signatures) | (Signatures) |
|-----------------------------------|---|--|--|
| Shashank MAHAJAN Author | Katan Hirachand Local Sponsor | Priscilla RODRIGUES Chief Compliance Officer | Katan Hirachand Chief Executive & Chief Country Officer, SG Bank India |

Table of Contents

| | | |
|---------------------|--|-------------------|
| 1 | INTRODUCTION..... | 3 |
| 1.1 | Objective and Scope:..... | 3 |
| 1.2 | Guiding principles:..... | 3 |
| 1.3 | Coverage..... | 3 |
| 1.4 | Areas covered under the Scheme | 3 |
| 1.5 | Salient Features of the Scheme..... | 3 |
| 2 | PROCEDURE FOR LODGING THE COMPLAINT UNDER THE SCHEME:..... | 4 |

1 INTRODUCTION

1.1 Objective and Scope: Société Générale (SG) aims to conduct its business with honesty and integrity. Promoting and fostering an open environment where employees are encouraged to report genuine concerns plays a vital part in guarding against malpractice and wrongdoing. Purpose of the Protected Disclosure Scheme is to Strengthen financial stability Enhance public confidence in the robustness of the financial sector.

This Policy is supplemental to and supports the SG Whistleblowing Policy.

1.2 Guiding principles: The Reserve Bank of India introduced Protected Disclosures Scheme for private and foreign banks operating in India wide circular dated April 18, 2007.

The scheme applicable to private sector and foreign banks operating in India has been formulated broadly on the lines of Government of India Resolution dated April 21, 2004 authorising the Central Vigilance Commission (CVC) as the designated agency to receive written complaints or disclosure on any allegation of corruption or misuse of office by any employee of the Central Government or of any corporation established by it or under any Central Act, government companies, societies or local authorities owned or controlled by the Central Government and recommend appropriate action.

1.3 Coverage: Under the scheme, all employees of the branches of India operation, customers, stake holders, NGOs and members of public can lodge complaints. Anonymous / pseudonymous complaints will not be covered under the Scheme and such complaints will not be entertained.

1.4 Areas covered under the Scheme: The complaints under the Scheme would cover the areas such as corruption, misuse of office, criminal offences, suspected / actual fraud, failure to comply with existing rules and regulations such as Reserve Bank of India Act, 1934, Banking Regulation Act 1949, etc. and acts resulting in financial loss / operational risk, loss of reputation, etc. detrimental to depositors' interest / public interest.

1.5 Salient Features of the Scheme: Reserve Bank of India (RBI) will be the Nodal Agency to receive complaints under the Scheme. RBI would keep the identity of the complainant secret, except in cases where complaint turns out to be vexatious or frivolous and action to be initiated against the complainant as below.

The Bank can take action against complainants in cases where motivated / vexatious complaints are made under the Scheme, after being advised by RBI. An opportunity of hearing will, however, be given by the bank to the complainant before taking such action. In case RBI finds that the complaint is motivated or vexatious, RBI shall be at liberty to take appropriate steps.

Final action taken by RBI on the complaint will be intimated to the complainant.

If any person is aggrieved by any action on the ground that he is victimized due to filing of the complaint or disclosure, he may file an application before the RBI seeking redressal in the matter. The system evolved herein shall be in addition to the existing grievances redressal mechanism in place. However, secrecy of identity shall be observed, only if the complaint is received under the scheme.

2 PROCEDURE FOR LODGING THE COMPLAINT UNDER THE SCHEME:

2.1 The complaint should be sent in a closed / secured envelope.

2.2 The envelope should be addressed to:
The Chief General Manager,
Reserve Bank of India,
Department of Banking Supervision,
Fraud Monitoring Cell, Third Floor,
World Trade Centre, Centre 1,
Cuffe Parade, Mumbai 400 005.

The envelope should be superscribed “Complaint under Protected Disclosures Scheme for Banks”.

2.3 Efforts should be made by the complainant to resolve the issue through internal channels, through the designated officials as below:

The Compliance Officer,
Société Générale
Peninsula Business Park, 19th Floor, Tower A,
Ganpatrao Kadam Marg, Lower Parel, Mumbai 400 013
Tel.: +91 22 6630 9500

2.4 The complainant should give his / her name and address in the beginning or end of the complaint or in an attached letter. In case of an employee making such complaint, details such as name, designation, department, Name of the Bank and place of posting etc. should be furnished.

2.5 Complaints can be made through RBI weblink giving full details as specified above. For this purpose, a specific weblink ([Reserve Bank of India - RBI Email Master](#)) has been created by RBI.

2.6 The complainant should ensure that the issue raised by him involves dishonest intention/moral angle. He should study all the relevant facts and understand their significance. He should also make an effort, if possible, to resolve the issue through internal channels in order to avoid making the complaint.

2.7 The text of the complaint should be carefully drafted so as not to give any details or clue to complainant’s identity. The details of the complaint should be specific and verifiable.

2.8 If any person is aggrieved by any action on the ground that he is victimized due to filing of the complaint or disclosure, he may file an application before the RBI seeking redressal in the matter.

RBI shall take such action, as deemed fit. In case the complainant is an employee of the bank, RBI may give suitable directions to the concerned bank, preventing initiation of any adverse personnel action against the complainant.

2.9 Either on the basis of application of the complainant or on the basis of information gathered, if the RBI is of the opinion that either the complainant or the witnesses in the case need protection, the RBI shall issue appropriate directions to the concerned bank.

2.10 In the event of the identity of the informant being disclosed inspite of RBI's directions to the contrary, the RBI shall be authorized to initiate appropriate action as per extant regulations against the person or agency making such disclosure. RBI may also direct such person or agency to suitably compensate the complainant.