



WHISTLE BLOWER POLICY

1. Purpose and Objective

Myelin Foundry Private Limited (hereinafter referred to as "the Company") is committed to the highest standards of integrity, ethical conduct, and accountability in all its business activities. This Whistleblower Policy provides a platform for reporting genuine concerns regarding any illegal, unethical, or improper conduct within the Company. The objective of this policy is to create a safe environment for employees, contractors, stakeholders, and external parties to raise concerns without fear of retaliation.

The Policy aims to:

- Encourage ethical conduct and promote a culture of honesty and accountability.
- Detect and prevent improper conduct, fraud, corruption, and other unlawful activities.
- Establish mechanisms for individuals to report suspected misconduct or violations of law.
- Protect whistleblowers from retaliation or harm as a result of reporting genuine concerns.

2. Applicability and Scope

This policy applies to:

- All employees (permanent, part-time, temporary, and contract workers).
- Directors and officers of the Company.
- Vendors, suppliers, contractors, and other business partners engaged with the Company.

This policy covers the following types of concerns:

- Financial fraud, manipulation of records, misrepresentation of financial statements.
- Bribery, corruption, or unethical dealings with external parties.
- Violation of applicable laws, regulations, or Company policies.
- Endangerment of the health, safety, and security of employees or the public.
- Workplace misconduct including harassment, discrimination, or abuse.
- Unethical behavior or conflict of interest.
- Damage to the environment or public health and safety.
- Any form of misconduct that could negatively impact the Company's reputation or financial standing.



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3. Whistleblower Protections and Rights

The Company recognizes that whistleblowers who report in good faith may have concerns about the risk of retaliation. As such, the following protections are guaranteed:

- **Protection from Retaliation:** The Company strictly prohibits any form of retaliation, including but not limited to harassment, discrimination, demotion, termination, or threats of harm, against a whistleblower who has reported a concern in good faith. Retaliation will result in disciplinary action, up to and including termination of the retaliator.
- **Confidentiality:** All reports made under this policy will be treated confidentially, and the identity of the whistleblower will not be disclosed without their consent, except as required by law.
- **Legal Protection:** The Company is committed to complying with applicable whistleblower protection laws. In cases where a whistleblower has been victimized for raising a concern, legal remedies will be available.

4. Reporting Channels and Mechanisms

The Company offers multiple channels for reporting concerns. Whistleblowers may choose the most appropriate option based on the nature and sensitivity of their concerns:

Internal Reporting to Supervisors: Employees are encouraged to report any concerns to their immediate supervisors or department heads. If the employee is uncomfortable doing so, they may escalate the issue through alternative reporting channels.

Whistleblower Officer: The Company designates the Compliance Officer or a designated official as the Whistleblower Officer. The Whistleblower Officer is responsible for overseeing all whistleblower concerns and investigations. Concerns can be raised through:

Email: nimisha.parmar@myelinfoundry.com

Phone: +91 9920890489

Mail: Addressed to "Whistleblower Officer" and marked as "Confidential", A-202/203, Miraya Rose, 66/1, Siddapura Village, Varthur Road, Whitefield, Bengaluru- 560066, Karnataka.

Anonymous Reporting: The Company recognizes that in certain situations, whistleblowers may prefer to remain anonymous. Anonymous reports can be submitted through:

A designated third-party whistleblower hotline (if available).

Anonymous email or letters submitted to the Whistleblower Officer.

However, whistleblowers should be aware that anonymity may limit the Company's ability to investigate the reported concern thoroughly.

External Reporting: In the event that the whistleblower feels their concerns are not being adequately addressed within the Company, they may report their concerns to external authorities, regulatory bodies, or law enforcement agencies as applicable under relevant laws.



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5. Procedure for Investigation

Upon receiving a report, the Whistleblower Officer or the Compliance Team will:

Acknowledge Receipt: The whistleblower will be informed of the receipt of their complaint within five business days, if their identity is known.

Preliminary Assessment: The Whistleblower Officer will conduct an initial assessment to determine whether the report falls under the scope of this policy and whether an investigation is warranted.

Investigation Team: If a full investigation is required, an independent investigation team will be appointed. The team may consist of members from the HR department, legal counsel, or external experts, depending on the nature of the concern.

Investigation Process: The investigation will be conducted in a thorough and impartial manner. All relevant evidence, documentation, and witness testimonies will be reviewed. The whistleblower may be contacted for further information if necessary.

Timeline: The Company will aim to complete investigations within 30 business days of receiving the report. If more time is needed, the whistleblower will be informed of the expected completion date.

Outcome and Recommendations: Once the investigation is complete, a report will be prepared with findings and recommendations for corrective actions. If wrongdoing is confirmed, appropriate disciplinary actions will be taken, which may include termination, legal action, or reporting to relevant authorities.

Feedback to Whistleblower: Where appropriate and permissible under law, the whistleblower will be informed of the outcome of the investigation. However, due to confidentiality obligations, the Company may not always be able to provide detailed feedback on specific disciplinary actions taken.

6. Safeguards Against Abuse of Policy

Good Faith Reports: This policy provides protection for whistleblowers who report concerns in good faith. If the whistleblower genuinely believes that their concern constitutes misconduct, even if the investigation finds no wrongdoing, they will still be protected.

False Allegations: If a whistleblower intentionally makes a false report with malicious intent or with the knowledge that the allegation is untrue, disciplinary action will be taken against the whistleblower, including possible termination or legal consequences.



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7. Record Keeping

The Whistleblower Officer will maintain detailed records of all reports, investigations, and outcomes under this policy. These records will be kept securely and treated with the highest degree of confidentiality.

All records will be retained for a minimum of seven years, in compliance with applicable legal and regulatory requirements.

8. Policy Communication and Awareness

This Whistleblower Policy will be made available to all employees, directors, and stakeholders of the Company. The Company will ensure that the policy is widely communicated and understood. Training sessions will be conducted regularly to raise awareness about whistleblower protections, reporting mechanisms, and the ethical standards expected by the Company.

9. Monitoring and Review of the Policy

The Board of Directors or designated senior management will review this policy at least annually to ensure its continued effectiveness. The policy may also be reviewed and amended in response to changes in applicable laws, regulations, or Company procedures.

Any amendments to the policy will be communicated to employees, stakeholders, and business partners as necessary.

Approved by: Board of Directors at their meeting held on 30th October 2024

Effective Date: 30th October 2024

Version: 1.0