

## **Details of establishment of Whistle Blower Policy**

ICICI Prudential Life Insurance Company Limited (herein referred as “the Company”) is committed to adopting the highest business, governance, ethical and legal standards. To aid in achieving this objective, the Company has formulated several policies and guidelines that assist the employees in maintaining these high standards. The Company also employs several modes of checks and balances to ensure adherence to its policies.

The purpose of the Whistle Blower Policy is to encourage employees/stakeholders to report matters without the risk of subsequent victimisation, discrimination or disadvantage. The Policy applies to all employees working for the Company, including directors of the Company and stakeholders of the Company.

The Whistle Blowing or reporting mechanism set out in the Policy, invites all employees/stakeholder to act responsibly to uphold the reputation of the Company. The Policy aims to provide a mechanism to ensure that concerns are properly raised, appropriately investigated and addressed. The Company recognises this mechanism as an important enabling factor in administering good governance practices.

The Whistle Blower Policy also complies with the vigil mechanism as envisaged by the Companies Act, 2013 and the rules framed thereunder.

### **Whistle Blowing ‘Concern’ or ‘Complaint’**

The Whistle Blower Policy encourages employees/stakeholders to report 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, Non-compliance to Anti-bribery & anti-corruption policy, Leak of any UPSI pursuant to SEBI Regulations or any such information prescribed pursuant to any regulations/laws, as amended from time to time.

The complainant (i.e. employee or director or stakeholder making the complaint) is encouraged to provide the following information in his/her complaint: name, contact details, employee number, and department. Other than complaints relating to concerns regarding questionable accounting or auditing matter, the Company shall not entertain any complaint where all such information is not provided, including anonymous/pseudonymous complaints. In respect of such anonymous/pseudonymous complaints (i.e. other than complaints relating to concerns regarding questionable accounting or auditing matters) no further action will be required to be taken and the case will be closed, without intimation to the complainant. The Head-Internal Audit may direct, in his/her discretion, that anonymous/pseudonymous complaints be considered under the Policy, even when such complaints do not relate to concerns regarding questionable accounting or auditing matters.

## **Reporting of a Whistle Blower concern/complaint**

The whistleblower may send a communication directly in writing through a letter to,  
Chairman, Audit Committee

ICICI Prudential Life Insurance Company Limited,  
ICICI Prulife Towers, 1089, Appasaheb Marathe Marg,  
Prabhadevi, Mumbai – 400025

Or

Head-Internal Audit,  
ICICI Prudential Life Insurance Company Limited,  
Unit No. 2A Raheja Tipco Plaza  
Ranisati Marg, Malad East  
Mumbai – 400097

Or

E-mail the complaints at [whistleblower@iciciprulife.com](mailto:whistleblower@iciciprulife.com)

Or

Employees can intimate through intranet portal (In case any employee chooses to remain anonymous, the system will not track or capture any identification parameter, including IP address or computer/device or any other identification whatsoever.)

Within a reasonable time of receipt of the concern by Head-Internal Audit, an acknowledgment shall be sent to the sender of the concern (where a return address or email address is available).

### **Administration of Policy:**

The Head-Internal Audit of the Company is the Nodal Officer who is responsible to receive, investigate and report all Whistle Blower complaints to the Audit Committee on a quarterly basis (without editing them).

Inquiry into the concerns received under this policy shall normally be completed within 90 days of receipt of the concern by Head-IAD. Concerns requiring additional time for inquiry shall be intimated to the Audit Committee at the time of reporting the status of inquiry and actions on a quarterly basis

## **Guidelines to the Whistle Blower**

- a) Whistle blowers are required to provide initial information relating to a reasonable belief that an unethical activity has occurred
- b) Whistle Blowers have a responsibility to be candid with the Investigators.

## **Confidentiality and Anonymity**

In relation to complaints relating to concerns regarding questionable accounting or auditing matters, an employee/stakeholder may choose to send communication under this Policy on an anonymous basis. However, in relation to such complaints, employees/stakeholders are encouraged to disclose their identities while raising concerns under this Policy. This will assist in obtaining additional details or evidence as may be required during the inquiry.

Strict confidentiality shall be maintained with regard to the identity of the complainant, both during and post investigation. The identity of the complainant shall not be released unless required by law.

## **Policy Communication**

Head - Internal Audit shall lay down an appropriate mechanism to communicate the policy periodically to all the employees/stakeholders and for its suitable display on the Company's intranet, etc.