

# Whistleblower Policy

Elite Wealth Limited

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## 1. Preamble

This Whistleblower Policy (“Policy”) of **Elite Wealth Limited** (“the Company”) is formulated in accordance with the latest SEBI Master Circular for Stock Brokers and Depository Participants, relevant provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and NSE Circulars relating to Whistleblower Mechanisms and Governance Standards.

The purpose of this Policy is to establish a mechanism for directors, employees, clients, and other stakeholders to report genuine concerns or unethical practices within the Company, and to ensure that such disclosures are appropriately investigated and resolved.

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## 2. Objective

The objective of this Policy is to:

- Encourage reporting of unethical, improper, or unlawful acts.
  - Protect whistleblowers from victimization and retaliation.
  - Ensure transparency, accountability, and integrity in operations.
  - Define the structure and process for redressal of complaints.
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## 3. Scope

This Policy applies to:

- All directors, officers, employees (permanent, temporary, or contractual).
  - Clients, business associates, and vendors of Elite Wealth Limited.
  - Any stakeholder who wishes to report misconduct or policy violations.
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## 4. Definitions

- **Whistleblower:** Any person who discloses or demonstrates evidence of an unethical or improper activity within the Company.
  - **Complaint:** Any concern raised in good faith regarding actual or suspected misconduct, fraud, violation of law, or regulatory non-compliance.
  - **Whistleblower Committee (WBC):** A designated committee constituted to review, investigate, and take appropriate actions on complaints received under this Policy.
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## 5. Composition of the Whistleblower Committee

In accordance with the latest SEBI and Exchange guidelines, the **Whistleblower Committee** shall comprise **a minimum of two senior members** of the Company. The composition of the committee for Elite Wealth Limited shall be as follows:

Name	Designation	Role in Committee
Mr. R. P. Seth	Chairman	Chairperson of the Whistleblower Committee
Mr Ankur Seth	Director	Member
Mr. Dheeraj Bhatia	Director	Member
Mr. Diwan Singh	Compliance Officer	Member

The Committee may invite external experts, auditors, or legal advisors as deemed necessary.

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## 6. Appointment of Whistleblower Redressal Head

A **Whistle-blower Redressal Head (WRH)** shall be appointed to oversee and manage the receipt and preliminary review of all whistleblower complaints.

- The **WRH** shall function under the guidance and supervision of the **Whistleblower Committee**.
  - The WRH will be responsible for initial assessment, documentation, and forwarding of complaints to the appropriate authority as per the escalation matrix.
  - The WRH shall also maintain a confidential register of all complaints received and track their resolution status.
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## 7. Reporting Channels

Whistle-blowers can report concerns through any of the following channels:

- **Email:** [compliance@elitewealth.in](mailto:compliance@elitewealth.in)
  - **Physical Submission:** Marked “Private & Confidential” to the Whistleblower Redressal Head, Elite Wealth Limited, S-8, DDA SHOPPING COMPLEX, MAYUR VIHAR PHASE-1, DELHI-110091
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## 8. Escalation Matrix for Complaints

The following **escalation matrix** shall apply to all complaints received:

<b>Nature of Complaint</b>	<b>To be Addressed To</b>
Complaints against <b>Board of Directors, Managing Director, Chief Executive Officer, Key Managerial Personnel (KMPs), Designated Directors</b> with the Exchanges, or <b>Promoters</b>	<b>Audit Committee</b> (or analogous body) of the Company
Complaints against <b>other employees, departments, or associates</b>	<b>Compliance Officer / Whistleblower Committee</b>
Complaints involving <b>the Compliance Officer or Whistleblower Committee members</b>	<b>Chairperson of the Audit Committee</b>

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## 9. Investigation Process

1. Upon receipt of a complaint, the WRH shall perform a preliminary review and submit a summary report to the Whistleblower Committee.
  2. The Committee will evaluate the materiality of the complaint and decide whether an independent investigation is warranted.
  3. The investigation shall be conducted confidentially, ensuring protection of the whistleblower’s identity.
  4. Findings will be submitted to the Audit Committee for final review and decision, wherever applicable.
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## 10. Protection of Whistleblower

- No adverse action, discrimination, or harassment shall be taken against a whistleblower who reports in good faith.
  - Any retaliation against a whistleblower shall be treated as a serious disciplinary offence.
  - The identity of the whistleblower shall remain confidential at all stages.
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## 11. Record Keeping and Reporting

All whistleblower complaints, investigation reports, and action taken reports shall be maintained by the Compliance Officer for a period of **minimum 8 years** or as prescribed by regulatory authorities.

A summary of significant complaints and resolutions shall be presented to the **Board and Audit Committee** on a periodic basis.

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## 12. Review and Amendment

This Policy shall be reviewed **annually** or as directed by SEBI/NSE to ensure alignment with the latest regulatory guidelines.

Any modifications to this Policy must be approved by the Board of Directors.

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### Approved By:

Board of Directors  
Elite Wealth Ltd

Last Review Date-25.07.2025

Next Review Due:24.07.2026