



WHISTLEBLOWER POLICY

(Read with Aviva Speak up (Whistleblowing) Charter- Version May 2025)

**AVIVA LIFE INSURANCE COMPANY INDIA
LIMITED VERSION MAY 2025**

VERSION CONTROL

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1. Introduction

The Insurance Regulatory & Development Authority of India (IRDAI) vide its Master Circular on Corporate Governance for Insurers, 2024 (Ref: IRDAI/F&I/CIR/MISC/82/5/2024) requires Insurers in India to put in place a “Whistleblower” Policy defining mechanisms for employees to raise concerns internally about possible irregularities, governance weaknesses, financial reporting issues or other such matters.

These could include employee reporting in confidence directly to the Chairman of the Board or of a Committee of the Board or to the Statutory Auditor.

The above said guidelines is supported by adopting and supporting a ‘speak up’ and ‘listen up’ culture across Aviva India’s business. It is vital that all employee abide by Aviva India’s values.

2. Objective & scope

The scope of this Whistleblower policy covers the following aspect:

- i. Awareness of the employees that such channels are available, how to use them and how their report will be handled.
- ii. Handling of the reports received confidentially, for independent assessment, investigation and where necessary for taking appropriate follow-up actions.
- iii. A robust anti-retaliation policy to protect employees who make reports in good faith.
- iv. Briefing to the board of directors.

This Whistleblower Policy is to be read with the Aviva Speak up (Whistleblowing) Charter- Version April 2025 as amended from time to time.

Employees may raise concerns in confidence with Chairman of the Board, Committee Board, the Statutory Auditor, Managers or any member of the leadership team or to the Speak Up of Aviva PLC. The details of the same are mentioned in the Aviva Speak up (Whistleblowing) Charter- Version April 2025.

3. Reporting to Authority (IRDAI)

The Appointed Actuary and the statutory/internal auditors have the duty to ‘whistle blow’, i.e., to report in a timely manner to the IRDAI if they are aware that Aviva India has failed to take appropriate steps to rectify a matter which has a material adverse effect on its financial condition. This would enable the IRDAI to take prompt action before policyholders’ interests are undermined.

4. Communication of the policy

The policy shall be communicated to all the Employees of Aviva India and other persons dealing with the Aviva India, through email, circular, or display on the Notice Board/ display on the Intranet/Internet.

5. Review

This policy will be subject to an annual review by the Chief Compliance Officer/ Head Legal Officer who may take assistance of the Group Investigations (GI) Team of Aviva India. For Aviva India, the policy owner is Chief Compliance Officer/ Head Legal Officer.

Enclosed: Aviva Speak up (Whistleblowing) Charter- Version May 2025

“This Policy is as per applicable extant regulations/laws.”