

Whistle Blowing Policy

Version 8

REZOLVE.ai

Document Information

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Revision History

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Reviewer and Approver

Name	Title	Comments	Date
Mr. Udaya Bhaskar Reddy	Co-Founder & CTO	Approved	24-Mar-2025

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Whistleblowing Policy

Rezolve.ai is committed to promoting and maintaining high standards of transparency, accountability, ethics, and integrity at the workplace in line with its Integrity, Innovation, Teamwork, Excellence, and Commitment (INTEC) Values. An accountable and transparent workplace provides a mechanism for employees to voice genuine concerns in a responsible and appropriate manner.

1. Objective of the Policy

This policy is formulated to help employees and third parties report possible improprieties at the earliest opportunity, so that the concern can be raised without fear of reprisal and detrimental action.

2. Scope

This policy applies to all employees, directors, third parties, and customers throughout the world, operating out of any location of the company.

3. Misconduct

Misconduct is any kind of bad, unethical, or illegal activity that, if proved, constitutes a disciplinary action or a criminal offense. This includes the following:

- Criminal Offense, Unlawful Act, Fraud, Corruption, Bribery, and Blackmail
- Failure to comply by legal and regulatory obligations
- Misuse of the Company Funds and Assets
- Unsafe work practices and substantial wasting of company resources
- Theft of confidential/proprietary/customer information
- Manipulation of company data/records
- Abuse of authority
- Breach of employee Code of Conduct or Rules
- Any other unethical behaviour

4. Raising a Concern

A disclosure of any misconduct may be made verbally or in writing via letter or email to the CTO at:

- **ub@rezolve.ai**
- **neil.dattani@rezolve.ai**
- **aanchal.saini@rezolve.ai**

Such reports should be factual rather than speculative and must contain as much specific information as possible to allow for a proper assessment of the nature, extent, and urgency of preliminary investigative procedures. The whistleblower need not prove the concern but must demonstrate sufficient grounds for raising the concern. The disclosure can also be made anonymously, but it will be the decision of the **Whistleblower Committee** whether to act upon an anonymous complaint or not, depending upon the disclosure made.

5. Protection

The whistle-blower shall be protected from any detrimental action as a direct consequence of the disclosure. Additionally, the whistleblower's identity and such other confidential information shall not be disclosed, save with the whistleblower's consent or otherwise required by law.

The company will keep the whistleblower's identity confidential unless:

- (a) The person agrees to be identified.
- (b) Identification is necessary to allow the company or law enforcement officials to investigate or respond effectively to the report.
- (c) Identification is required by law.
- (d) The person accused of compliance violations is entitled to the information as a matter of legal right in disciplinary proceedings.

The company prohibits retaliation against a whistle-blower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistle-blowers who believe that they have been retaliated against may file a written complaint with the **Whistle-blower Committee**. A proven complaint of retaliation shall result in a proper remedy for the person harmed and severe disciplinary action, including termination of employment, against the retaliating person.

This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

6. Remedies and Discipline

If the **Whistleblower Committee** determines that an unethical and improper practice has occurred, it will take the following actions as deemed fit to correct it:

- Any person found guilty of violation of the company's Code of Conduct will be subject to disciplinary action up to and including termination of employment.
- Appropriate procedures, policies, and controls will be established in all departments to ensure early detection of similar violations.
- During the investigation period or at any time thereafter, if any employee is found to be:
 - (a) retaliating against the whistle-blower
 - (b) coaching witnesses, or
 - (c) tampering with evidence,
 - then it would lead to severe disciplinary action, including termination of employment.

7. Communication

This policy, as amended from time to time, shall be disclosed on the website of the company.

Note -Next review cycle for this policy is **March 2026**.Management can review the policy at any time and make changes depending on the situation.

All documents related to policies and procedures where applicable, any reference to Actionable Science is as good as Rezolve.ai.