

VIRTUOUS ADVISORS & RESOURCES PRIVATE LIMITED

(“VARPL” / “Virtuous Resources”)

ANTI-FRAUD, CONFIDENTIALITY, NON-TRANSACT & COMMUNICATION DISCIPLINE POLICY

Along with Public Disclaimer & Liability Limitation Notice

Effective Date: 1st April 2026

Issued By: Board of Directors, Virtuous Advisors & Resources Pvt Ltd

1. OBJECTIVE OF THIS POLICY

This Policy has been formulated by Virtuous Advisors & Resources Pvt Ltd (“VARPL” or “Virtuous Resources”) to:

- Prevent fraud, impersonation, phishing, social engineering, unauthorized communications and misuse of the Company’s name;
- Ensure the highest standards of confidentiality, discipline, integrity and compliance among all staff, representatives and associated persons;
- Prohibit any unauthorized financial or monetary discussions or transactions in the name of VARPL;
- Protect candidates, clients, vendors, consultants and the general public from fraudulent communications falsely claiming association with VARPL or its personnel;
- Clarify that no employee, consultant or representative has any authority whatsoever to seek, discuss, negotiate or transact money unless specifically authorized in writing by the Directors of VARPL.

2. ABSOLUTE NON-TRANSACTION POLICY

2.1 Strict Prohibition

Under no circumstances shall any:

- Employee,
- Recruiter,
- Consultant,
- Advisor,
- Associate,
- Representative,
- Freelancer,
- Contractor,
- Intern,
- Temporary staff,
- Vendor representative,
- Business associate,

- Or any person claiming to act for or on behalf of VARPL

directly or indirectly:

- Ask for money,
- Discuss financial arrangements,
- Negotiate payments,
- Request deposits,
- Seek commissions,
- Share banking details,
- Share UPI details,
- Seek reimbursements,
- Ask for advance payments,
- Request onboarding charges,
- Demand registration fees,
- Seek recruitment fees,
- Request processing charges,
- Ask for consulting payments,
- Collect monies in cash or otherwise,
- Share payment links,
- Request gift cards,
- Request crypto or wallet transfers,
- Or engage in any financial communication whatsoever,

unless expressly approved through a written authorization signed by the Directors of VARPL.

3. INTERNAL STAFF DISCIPLINE & CONFIDENTIALITY REQUIREMENTS

3.1 Monetary Discussions Strictly Prohibited

Even internally within the organization, employees and representatives are strictly prohibited from:

- Discussing unauthorized financial matters;
- Sharing payment-related information casually;
- Circulating banking details;
- Informally negotiating monetary arrangements;
- Discussing candidate/client payment structures without authorization;
- Conducting unofficial financial communications;
- Sharing confidential compensation or commercial arrangements externally;
- Using personal accounts for any business purpose.

Employees are expected to maintain:

- Highest confidentiality,
- Strict communication discipline,
- Need-to-know information sharing,
- Professional restraint,
- Zero tolerance toward unauthorized financial discussions.

4. PUBLIC WARNING AGAINST FRAUD & IMPERSONATION

IMPORTANT PUBLIC NOTICE

Virtuous Advisors & Resources Pvt Ltd (“VARPL” / “Virtuous Resources”) hereby publicly declares and notifies all candidates, clients, vendors, consultants and members of the public that:

VARPL AND ITS STAFF SHALL NEVER:

- Ask candidates for money;
- Request placement charges;
- Seek registration fees;
- Demand deposits;
- Ask for onboarding charges;
- Request consultancy fees through WhatsApp/SMS;
- Seek advance payments;
- Request payments to personal bank accounts;
- Seek UPI transfers;
- Ask for OTPs or passwords;
- Request gift cards or wallet transfers;
- Conduct unofficial transactions;
- Share unauthorized payment links;
- Ask any person to transfer money in relation to jobs, recruitment, business opportunities or services.

5. DO NOT RESPOND OR REACT POLICY

Any person receiving:

- Emails,
- WhatsApp messages,
- SMS communications,
- Phone calls,
- Social media messages,
- Telegram communications,
- Offer letters,
- Payment instructions,
- QR codes,
- Invoices,
- Banking requests,
- Financial demands,
- Or any communication appearing to originate from VARPL or its staff seeking any monetary action

is strongly advised:

NOT TO:

- Respond,
- React,
- Engage,
- Transfer funds,
- Share banking details,
- Share OTPs,
- Share confidential information,
- Or act upon such communication in any manner whatsoever.

Such communications should be treated as:

- Fraudulent,
- Unauthorized,
- Suspicious,
- Potentially criminal,
- And immediately reportable to cybercrime authorities.

6. NO AUTHORITY OF STAFF OR REPRESENTATIVES

No employee, consultant, recruiter, associate or representative of VARPL shall have authority to:

- Bind the Company financially;
- Negotiate commercial transactions independently;
- Seek payments;
- Modify payment instructions;
- Share banking arrangements;
- Approve reimbursements;
- Request deposits;
- Conduct collections;
- Or enter into financial commitments,

unless specifically authorized in writing by the Directors of VARPL.

Any oral statements, WhatsApp messages, emails, SMS communications or representations made without such authorization shall be deemed invalid, unauthorized and non-binding upon VARPL.

7. DISCLAIMER & LIMITATION OF LIABILITY

PUBLIC DISCLAIMER

Virtuous Advisors & Resources Pvt Ltd expressly disclaims and denies any liability, responsibility or accountability for:

- Unauthorized monetary transactions;
- Fraudulent transfers;
- Payments made to third parties;
- Transactions based on fake communications;
- Actions taken upon spoofed emails or WhatsApp messages;

- Financial losses arising from impersonation;
- Fraudulent job offers;
- Unauthorized payment requests;
- Or any transaction undertaken without formal written authorization from the Directors of VARPL.

VARPL shall not be liable for any:

- Direct losses,
- Indirect losses,
- Consequential damages,
- Fraud-related losses,
- Cyber fraud,
- Unauthorized transfers,
- Reliance on fake communications,
- Or actions taken by candidates, clients or third parties based on unauthorized representations.

8. DIRECTOR-ONLY AUTHORIZATION REQUIREMENT

Any financial instruction, commercial arrangement, payment approval or monetary transaction shall be valid only if:

- Issued formally in writing;
- Authorized expressly by the Directors of VARPL;
- Verified through official channels;
- Supported by proper documentation.

Any communication lacking such authorization shall be considered null, void and unauthorized.

9. MANDATORY FOOTNOTE FOR ALL JOB DESCRIPTIONS (JDs), EMAILS & COMMUNICATIONS

STANDARD FRAUD PREVENTION FOOTNOTE

Fraud Prevention & Public Disclaimer:

Virtuous Advisors & Resources Pvt Ltd (“VARPL” / “Virtuous Resources”) and its employees, consultants, recruiters or representatives shall never request money, deposits, fees, commissions, payments, banking details, UPI transfers, wallet transfers, gift cards, cryptocurrency or any financial transaction from candidates, clients or third parties under any circumstances whatsoever.

Any email, WhatsApp message, SMS, phone call or communication seeking financial transactions in the name of VARPL or its staff or representatives, should be treated as unauthorized, fraudulent and non-binding.

Kindly do not respond, react, transfer funds or share confidential information unless supported by written authorization from the Directors of VARPL through official channels.

VARPL or its staff or representatives disclaims all liability arising from unauthorized or fraudulent communications or transactions undertaken without formal written approval from the Directors of the Company.

10. REPORTING OBLIGATION

All employees, candidates, clients and vendors are encouraged to immediately report:

- Fake recruiters,
- Suspicious emails,
- Fake WhatsApp numbers,
- Impersonation attempts,
- Fraudulent payment requests,
- Unauthorized offer letters,
- Or suspicious communications

to the official management contact designated by VARPL.

11. DISCIPLINARY ACTION

Violation of this Policy by any employee or representative may result in:

- Immediate suspension,
- Termination,
- Recovery proceedings,
- Legal proceedings,
- Police complaints,
- Cybercrime complaints,
- Civil liability,
- Criminal prosecution,
- Blacklisting and permanent disassociation.

12. FINAL DECLARATION

This Policy shall apply universally across all operations, offices, representatives, consultants, recruiters and associated persons of Virtuous Advisors & Resources Pvt Ltd and shall remain binding unless modified expressly in writing by the Board of Directors.

Issued in public interest by:

Board of Directors

Virtuous Advisors & Resources Pvt Ltd (VARPL)