

WHISTLE BLOWER POLICY

INTRODUCTION

Technichem Organics Pvt. Ltd. believe in promoting a fair, transparent, ethical and professional work environment and is committed to adhere to the highest standards of moral and legal conduct of business operations.

The Company believes that its constituents (Directors, Employees and others stakeholders) should conduct their affairs in fair and transparent manner by adopting highest standards of professionalism, integrity, honesty and ethics.

The Company encourages the employees to voice their genuine concerns without fear of contempt.

OBJECTIVE OF WHISTLE BLOWER

The objective is to encourage Employees to report genuine ethical and legal concerns, violations and suspected fraudulent behaviour of which they are or become aware of, to an internal authority so that action can be taken immediately to resolve the problem.

To minimize the Company's exposure to the damage that can occur when the employees actually or potentially try to circumvent internal mechanisms in furthering the aforementioned concerns, violation and frauds.

SCOPE OF THE POLICY

Policy sets out the procedure to be followed when making a disclosure. This Policy covers malpractices and events which have taken place / suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of Company's rules, manipulations, negligence causing danger to public health and safety, misappropriation of monies and other matters or activities on account of which the interest of the Company is affected.

However, the mechanism does not release the employees from their duty of confidentiality in the course of their work and nor can it be used as a route for raising malicious or unfounded allegations about a personal situation.

The Mechanism not only helps to detect fraud in organizations, but is also used as a corporate governance tool, which prevents and deters fraudulent activity.

Upon receipt of the Vigilance Disclosure (Whistle blower, the Recipient shall make its record and ascertain from the complainant about the same. He shall also carry out initial investigation either himself or engage any other Officer of the Company or an outside agency.

- a) All Vigilance disclosures under this policy will be recorded and thoroughly investigated. The Audit Committee may investigate and may at its discretion consider involving any other Officer of the Company and/or an outside agency for the purpose of investigation.

- b) Subject(s) will normally be informed in writing of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- c) Subject(s) have a right to consult with a person or persons of their choice,
- d) Subject(s) have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed.
- e) Subject(s) have a right to be informed of the outcome of the investigations.
- f) The investigation shall be completed normally within 60 days of the receipt of the Vigilance disclosure and is extendable by such period as the Audit Committee deems fit.

Decision and Reporting

If outcome of the Investigation indicates that an improper or unethical or wrongful act has been committed, it will be recommended to the management of the Company to take appropriate corrective action. Any such disciplinary or corrective action shall be subject to the applicable personnel or staff conduct and disciplinary procedures.

If Complainant is not satisfied with Report, he has the right to report the event to the appropriate legal or investigating agency.

A complainant who makes false allegations or about alleged wrongful conduct shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

Secrecy/Confidentiality

The complainant, Members of Audit Committee, the Subject and everybody involved in the process shall:

- Maintain confidentiality of all matters under this Policy
- Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.

Protection

No unfair treatment will be meted out to a Complainant by virtue of his/her having reported a Vigilance Disclosure under this policy. Complete protection will, therefore, be given to Complainants against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, or the like including any direct or indirect use of authority to obstruct him to perform his duties/functions including

The identity of the Complainant shall be kept confidential to the extent possible and permitted under law. The identity of the complainant will not be revealed by the Company

Any other Complainant assisting in the said investigation shall also be Vigilance to the same extent as the Complainant.

AUTHORISED PERSON CONTACT DETAILS:

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Approved By,



Director

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