



VIRUPAKSHA ORGANICS LIMITED

(WHO-GMP AND ISO 9001: 2015 Certified Company)

Corporate office: Plot No. B-4, IDA, Gandhinagar, Hyderabad – 500 037, Telangana, INDIA
Tel : +91-40-23073417, 23075816, Fax : +91-40- 23720738, Email: info@virupaksha.com

WHISTLE BLOWER POLICY

1.0 PURPOSE

1.1 In recognition of the value that an empowered and informed workforce can offer, **Virupaksha Organics Limited (VOL)** has established these whistleblower procedures (the “Whistleblower Policy”) to provide guidance and procedures for the receipt, investigation and retention of reports of suspected violations of laws, rules, regulations, the Code or other VOL policies, sometimes known as whistleblower complaints.

2.0 SCOPE

- 2.1 This procedure reinforces the protections afforded to individuals/entities who come forward, including anonymously, to make reports or voice concerns about violations of the Code, VOL policy or suspected violations of law or regulations that govern VOL’s operations.
- 2.2 VOL appreciates that individuals/entities will raise concerns only if they know that doing so will make a difference; therefore, all requests for guidance and reports of misconduct will be treated seriously and VOL is committed to taking corrective action whenever necessary to ensure the appropriate and timely resolution and remediation of matters.
- 2.3 This Policy is not intended to address individual employee grievances or complaints relating to job performance and terms and conditions of employment, or individual third party grievances relating to terms and conditions of contract, which will be addressed by the respective departments in line with related existing policies.

3.0 Definitions

3.1 Whistleblower:

A person or entity making a protected disclosure about improper or illegal activities is commonly referred to as a whistleblower. **Whistleblowers may be VOL employees, applicants for employment, other interested parties like vendors, contractors, suppliers, customers, general public etc.** The whistleblower’s role is as a reporting party. They are not, investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted

3.2 Misconduct / Improper Activities:

Examples of misconduct include, but not limited to, fraud, including financial fraud and accounting fraud, violation of laws and regulations, violation of Company

G. Chandra Mouliswar Reddy
Managing Director

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policies, unethical behaviour or practices, endangerment to public health or safety and negligence of duty.

4.0 RESPONSIBILITY

1. Director Operations
2. Disciplinary committee

Whistleblowers: Whistleblowers should act in good faith and should not make false accusations when reporting of misconduct by the Company's employees.

Suspects: Suspects have a duty to cooperate with investigators. The identity of the suspect shall remain confidential.

Investigators: All investigators derive the authority to handle all matters seriously, confidentially and promptly. All investigators shall be independent and unbiased both in fact and appearance.

Investigation Participants (witness): Employees who are interviewed or asked to provide information have a duty to fully cooperate with the investigators. Participants should refrain from discussing or disclosing matters concerning the investigations.

5.0 PROCEDURE

5.1 Principle of Reporting

- 5.1.1 If a VOL employee/interested party believes in good faith that a rule or one of the principles laid down in VOL Code of Ethics and policies has been or is about to be violated, he or she should inform his or her superior or the Compliance Department of his or her concerns regarding possible illegal act or ethical violation.
- 5.1.2 Any employee/interested party, who has any concerns relating to actual or potential illegal or unethical practices in finance, accounting, internal control, free competition or the fight against corruption should report his/her concerns under this policy. When in doubt whether an activity or behavior is a violation or not, employee should report the same.
- 5.1.3 Employees, other than executives, that have a concern are encouraged to discuss such matters first with their supervisors, managers or other appropriate personnel such as local Human Resources, or local legal counsel. Concerns relating to the employment terms or matters at the local

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workplace such as conflicts with colleagues and managers, disciplinary sanctions, correct and timely payment of wages and benefits should normally be resolved locally, unless the matter is exceptionally serious or cannot be reported through the normal reporting line.

5.2 What to Report

- 5.2.1 Below are few examples though non-exhaustive of the areas where non-compliance may be reported:
- 5.2.2 Harassment or Discrimination & Workplace Violence
- 5.2.3 Protection of Confidential Information and intellectual property
- 5.2.4 Improper promotion and improper sales practices
- 5.2.5 Conflicts of Interest
- 5.2.6 Environmental Health and Safety issues
- 5.2.7 Insider Trading
- 5.2.8 Anti-competitive behavior
- 5.2.9 Theft, misuse of VOL's assets
- 5.2.10 Retaliatory action as mentioned in this policy
- 5.2.11 Child labour
- 5.2.12 Forced labour
- 5.2.13 Gifts, Bribery and Kickbacks
- 5.2.14 Human rights
- 5.2.15 Any Illegal or unethical Practices
- 5.2.16 Any other violations of policies and procedures

5.3 Channels of raising Concerns

- 5.3.1 Members of the Board of Directors of VOL and Management Committee members can report directly, in writing, to the Chairman of the WBC Committee.
- 5.3.2 Employees of VOL are free to choose the reporting channel for their complaints and can report to the immediate supervisor or any Manager in the line of command or directly to:
 - 5.3.2.1 Human Resources
 - 5.3.2.2 Head of Department
 - 5.3.2.3 Site Heads
 - 5.3.2.4 Legal Department
 - 5.3.2.5 Internal Audit

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- 5.3.2.6 VOL secretary
- 5.3.2.7 Compliance Director
- 5.3.2.8 Managing Director
- 5.3.2.9 Management Committee Members

5.3.3 All external stakeholders/contractors/general public can send their concern to chairman/WBC committee through email.

Mr. G. Chandrasekhar Reddy, designation: Director Operations

Email:

5.3.4 All complaints should be sent to the Compliance Director and/or VOL Company Secretary and under exceptional circumstances an employee can also send complaint, in writing, directly to the Chairman of the WBC Committee on the following.

Reporting Details:

Chairman	Member	Member
G. Chandrasekhar Reddy	K. Gangi Reddy	SK. khader Basha
+91-9030995515/17	+91-9912571954	+91-9966938870
gesreddy@virupaksha.com	hr@virupaksha.com	hr@virupaksha.com

5.3.5 In case, where concern is raised with deliberate and/or ill motive to tarnish the reputation of employee/s and department/s of VOL, the person raising such concern will undergo the investigation process and disciplinary action.

5.4 Investigation and Disciplinary Action

Compliance Director will take effective steps to respond to any concern which has been reported. The person raising such concern will also be informed of the outcome of the investigation. In case detailed investigation needs to be conducted, the Audit Committee may direct such investigation to be conducted, if necessary, by an independent external agency. The Compliance Director would be responsible to obtain such internal approvals as may be required. Based on the report of the Investigating Authority or upon his own findings, Compliance Director will recommend disciplinary action in consultation with the Disciplinary Committee. All disciplinary action recommended will be in accordance with applicable laws.

5.4.1 Disciplinary Committee presently comprises of the following members:

- 1. Director -Operations
- 2. HRA Head

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3.Asst.manager-HRA

5.5 Management Assurance

5.5.1 Identity of the Complainant

Members of the Board of Directors and employees/other interested parties are encouraged to report the incident by identifying themselves. Such identification helps the investigation process. In case the complainant decides not to disclose his/her identity, an Anonymous report can be submitted. It is the responsibility of each person to report an incident regardless of the choice of disclosing or not disclosing his/ her identity. The identity of the complainant will be kept confidential if asked to do so and will be disclosed only if it becomes necessary for investigation purposes or in certain circumstances where it is legally required to be so disclosed.

5.5.2 No Retaliation

VOL assures that there will be no retaliatory action against any employee/third party who has reported any incident of non-compliance in good faith, using any appropriate channel of communication as provided for in this policy.

5.6 Report to Audit Committee

A quarterly report will be submitted to the Audit Committee by VOL Secretary on the number of complaints received in the preceding quarter, action taken on the complaints and results of investigations, if carried out.

5.7 Retention of Documents

All the documents in relation to concern received and gathered during investigations shall be kept by the Compliance Director for a period of five years.

5.8 TRAINING AND SENSITIZATION

Appropriate training and sensitization to be provided to employees and third parties on Whistle Blower Policy.

5.9 Amendment

VOL may amend / modify this policy in whole or part from time to time, with the approval of the Audit Committee.

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