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# Whistle Blower Policy

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## 1. Whistle-blower Policy

### 1.1. Applicability

- This policy applies to all Enzene stakeholders such as employees (whether permanent or on contract), investors, customers, vendors and other stakeholders.

### 1.2. Objective

- Enzene believes that stakeholders are our most valuable asset and are critical to the success of our business. At Enzene, we are committed to foster an environment of honest and open communication and discussion, consistent with our values and code of conduct.
- The objective of Whistle-blower Policy is to provide a platform for stakeholders (also referred in this document as “whistle-blower” or “person”) to raise any concerns (also referred in this document as “whistle-blow complaint”) in nature of ethical, moral and legal business conduct in line with Company’s code of conduct.

### 1.3. Whistle-blow complaint

- A "whistle-blow complaint" is a complaint or concern where a Whistle Blower (person raising the Complaint) believes that Enzene (or an officer of Enzene) has, or may have, breached the Code of Conduct, Accounting, Internal Accounting Controls, Auditing Matters, and its best practices, and applicable national and international laws including statutory / regulatory rules and regulations.

### 1.4. Reporting Channels & Mechanism

- Any stakeholder can report or address their concerns (or whistle-blow complaint) to the committee through following channels:
  - Orally through Whistle-blower hotline number at 1800 266 0208 or email at [ethics@enzene.com](mailto:ethics@enzene.com)
- It is the discretion of the Whistle Blower to conclude whether or not the issue shall be raised anonymously. For the matter to be aptly investigated, the Whistle Blower may choose to disclose his/her identity along with the details of the complaint. While the anonymous complaints will also be suitably and sincerely looked into, it will provide more leverage and will be pertinent to investigate the complaint sufficiently if the Whistle Blower chooses to disclose his /her identity. The identity of the whistle-blower shall be kept confidential to the maximum reasonable extent.
- There is no time limit for reporting the concern. However, the concerns should be reported at the earliest possible preferably immediately after occurrence.
- It is important that stakeholders speak up or specify complete details concerning the complaint and also provide any supporting document, so that complaint is addressed in a proper manner. The Company will strive to maintain confidentiality to the greatest extent possible and discussion of the item should be limited to only those individuals with a “need to know.”
- It is encouraged to first talk to an appropriate supervisor for any question or a concern. Whistleblower can also choose or prefer to use another avenue for addressing issues, by speaking or writing to any one of the following:
  - the next higher level of supervision; or
  - operating unit head; or
  - local Human Resources representative; or
  - any member of Vigil committee:
- Concerned employee receiving such oral or written communication from a whistle-blower needs to acknowledge; and initiate action or escalate to Vigil Committee within 24 hours of receiving such communication. These discussions will also be treated confidentially as defined above, and individuals who participate in investigations will be protected from retaliation.

## 1.5. Formulation of the Vigil Committee

- For the purpose of the Vigil mechanism a high level committee is formed, herein referred to as 'Vigil Committee' who shall receive all whistle-blow complaints through hotline or email.
- It is the responsibility of Vigil committee to:
  - Ensure that stakeholders are made aware of this Policy and Enzene's commitment to it;
  - Create an environment in which any stakeholder can raise what they believe to be honest issues to any level of leadership without fear of retaliation; and
  - Fully cooperate and respond in a timely and professional manner.

## 1.6. Dealing with the concern & reporting

The concerns reported shall be dealt in the following manner:

- Any concern raised through the reporting channel shall be forwarded to the Vigil committee.
- Vigil committee will attempt to do a preliminary review within 72 working hours. The purpose of this review is to verify that the concern falls within the purview of this policy.
- Any whistle-blow complaint which has potential financial impact of more than INR 1 crore, the Audit Committee Chairman shall automatically precede as chairperson of Vigil Committee and will decide further course of action.
- Based on the preliminary review, Vigil committee or Audit Committee Chairman (in case of financial impact > INR 1 crore) shall decide upon the further course of action. The possible actions may be appointment of a multi-disciplinary investigation committee or external agency.
- If the reported concern is against any member of the Vigil committee or Board of Director or Audit Committee, the concerned member shall be excluded from carrying out the preliminary as well as detailed investigation.
- If any further information is required for the purpose of carrying out preliminary review or investigation, the person reporting the concern may be contacted and informed. In case, the person fails to appear before the committee or provide the information, case may be closed and investigation may be discontinued.
- The preliminary report as well as investigation report is to be presented to the Audit Committee and Board of Directors. In case, the reported concern is regarding one of the directors, the concerned person shall be excluded from such presentation.

## 2. Whistle-Blower Retaliation

- Whistle-blower retaliation is personnel action in response to a protected disclosure of information and includes actions that could adversely affect the whistle-blower, such as:
  - A non-promotion
  - A disciplinary action
  - A detail, transfer or reassignment
  - An unfavourable performance evaluation
  - A decision concerning pay, benefits or awards
  - A significant change in duties, responsibilities or working conditions
- Retaliation against any employee or stakeholder who in good faith seeks advice, raises a concern or reports misconduct is strictly prohibited. The fact that an employee or Contingent Worker has raised a concern in good faith, or has provided information in an investigation, cannot be a basis for denial of benefits, termination, demotion, suspension, threats, harassment, discrimination, or other employment actions.
- If the concern raised by the person is in good faith and with a belief of it being true, but the investigation proves it to be wrong, no action shall be taken against the person.
- If any individual, regardless of his or her role in Enzene, retaliates against an employee or Contingent Worker who has truthfully and in good faith reported a potential violation, Enzene will take appropriate action – even if it later turns out that the employee or Contingent Worker was mistaken in reporting the matter originally. However, if an individual has intentionally made a false report, the Company will respond accordingly. If Whistleblower or any other individual

believes that they have been retaliated against for raising a good faith concern, they should contact the Vigil committee immediately.

### **3. Consequences of non-compliance**

- Violations of this procedure may result in disciplinary action up to and including termination. Contingent workers will be subject to discipline according to the terms and conditions of the agreement with the contracted service provider.

### **4. False Reporting**

- If at any time, it is revealed that the concern was raised with mala-fide intent, then the person reporting it will be subjected to disciplinary action, including termination of employment.

### **5. Retention**

- Documents received/generated during the course of reporting, investigation and enforcement pursuant to this Policy, shall be retained as per Enzene's record retention policy and applicable local or international laws or regulations.

### **6. Amendment to the policy**

- The policy may be amended with the approval of Board of directors. Amendments may be necessary to comply with laws or regulations or for any other business reasons.