

Whistle Blower Policy

	Farmson Basic Drugs Private Limited
	HR Policies – Whistle Blower Policy

Revision Details

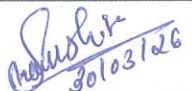
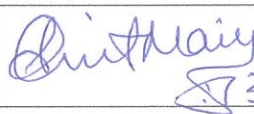
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1. Introduction

Farmson Basic Drugs Pvt. Ltd. is committed to proactively adhere and demonstrate the highest possible standards of ethical practices, moral values and legal conduct while carrying out various business operations. Therefore, in case of an actual or suspected violation of these standards, the management and employees, called as Whistle Blowers, are encouraged to come forward and freely communicate their concerns to the appropriate authority, without fear of victimization or any adverse action or discrimination, so that timely and speedy investigations and necessary corrective actions can be undertaken as per the gravity of the case.

2. Purpose

This Policy applies to all directors, employees, workers, trainees, apprentices, probationers, consultants, contract workers, agency staff, interns, visitors, suppliers, service providers, vendors, contractors, distributors, customers, and any other external or internal stakeholder associated with or impacted by the Company's operations or value chain

3. Scope

This Policy applies to every person engaged with the FARMSON for any work whatsoever, on a regular, contract, trainees, apprentices, probationer, and even a visitor.

4. Definitions

The definitions of some of the key terms used in this Policy are given below. Capitalized terms not defined herein shall have the meaning assigned to them under the Code.

- a) **“Audit Committee”** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013 and read with Clause 49 of the Listing Agreement with the Stock Exchanges.
- b) **“Employee”** means every employee of the Company (whether working in India or abroad), including the directors in the employment of the Company.
- c) **“Code”** means the FARMSON's Code of Conduct.
- d) **“Investigators”** mean those persons authorized, appointed, consulted or approached by the Ethics Counsellor/Chairman of the Audit Committee and includes the auditors of the Company and the police.
- e) **“Protected Disclosure”** means any communication made in good faith that discloses or demonstrates information that may be evidence of unethical or improper activity.
- f) **“Subject”** means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during an investigation.
- g) **“Whistleblower”** means an Employee or Director making a Protected Disclosure under this
- h) **“Alert”** means Information received by any available reporting channel (line managers, People & Culture, or via any another channel that a stakeholder considers to be the most appropriate).
- i) **“Non-Compliance”** means Violation of law, regulation, Industry Code of Practice, procedure, or Code of Conduct.

5. Policy

Improper or unethical activities include, but not limited to, abuse of authority, breach of contract, negligence causing substantial and specific danger to public health and safety, manipulation of company data/records, financial irregularities, misrepresentation of financial reports, unlawful acts, pilferage of confidential or propriety information, wastage or misappropriation of funds and assets, unethical behaviour such discrimination, bribery etc. The disclosures in relation to above matters can be provided in strict confidentiality, documented as Protected Disclosures with reliable information, promptly by Whistle Blowers. They are not required or expected to participate in investigations or determination of appropriate remedial or corrective actions unless specifically requested by investigation committee. Protected disclosure will be appropriately dealt by the committee.

6. Notifying concerns

a) Principles

All stakeholders are encouraged to report any concerns to their immediate supervisor, HoD or the internal committee members:

You should report if you notice:

- Any violation or possible violation of company policies or Code of Conduct
- Any illegal activity or unethical behaviour
- Any issue related to finance, accounting, internal controls, fair competition, or anti-corruption practices.

If there is uncertainty about whether a violation has occurred, the matter should still be reported. Farmson strongly promotes a culture of open and honest reporting. Anyone who raises a concern in good faith will be protected from retaliation, regardless of whether the concern is ultimately confirmed or not.

b) Types of Concerns That Can Be Reported

Stakeholders can report any actual or suspected violations of the Company's Code of Conduct, internal policies, laws, or regulations. Examples include, but are not limited to:

1. Harassment, discrimination, or workplace violence
2. Unauthorized sharing of confidential information or intellectual property
3. Data privacy breaches
4. Fraud, financial misconduct, or irregular accounting practices
5. Corruption, bribery, or involvement in improper transactions
6. Unethical marketing, promotion, or sales activities
7. Conflict of interest situations
8. Pressuring others to act against company rules or legal requirements
9. Failure to follow legal or statutory obligations while performing company duties
10. Anti-competitive or unfair business practices
11. Theft or misuse of company property or resources
12. Any form of retaliation against an individual raising a concern
13. Environmental, health, or safety-related issues
14. Any illegal act (civil or criminal)
15. Misuse of position or authority for personal benefit
16. Actions that could harm the company's reputation or create serious risk
17. Violations of the Code of Conduct, including leakage or suspected leakage of sensitive information (UPSI)
18. Grievance of nearby community

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19. Any other unethical or unlawful act that goes against company policies, laws, or ethical standards

7. Internal Committee

The committee are as follow -

S. No	Name of Committee Members	Designation	Contact Details
1	Sudhesh Mishra	COO & Director	Email: samishra@farmson.com
2	Sheela Nair	Manager - Purchase	Email: rmpurchase@farmson.com
3	Prashant Shihora	General Manager	Email: production_fpgpl@farmson.com
4	Mayur Patel	General Manager	Email: mayurpatel@farmson.com
5	Shailesh Rane	Works Manager	Email: shaileshrane_u-3@farmson.com
6	Anit Nair	AGM - HR	Email: anit@farmson.com

8. Roles & Responsibilities of Internal Committee

1. The Chairperson of the Committee shall detach the covering letter/email and forward only the protected disclosure to the investigation committee for a prima facie view and further investigations, if required. The identity of the Whistle Blower shall be restricted to Chairperson of the Committee. Anonymous disclosures may be submitted and shall be reviewed where sufficient information and supporting evidence are available. The Chairperson of the Committee shall determine whether further investigation is warranted.
2. FARMSON is committed to thoroughly investigate the protected disclosure promptly as a neutral fact-finding process to identify necessary actions as per the nature and gravity of the case. The Investigation committee shall have right to call for any information/ document and examination of any employee of the company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.
3. The outcome of the investigation shall be documented maintaining the confidentiality of whistle blower. Investigation committee shall prepare a report after completion of investigation and action to be taken thereof and shall present it to the Ethical/Audit Committee. If & when the Ethical/Audit Committee is satisfied that the alleged wrongful act existed or is in existence, then the Ethical/Audit Committee shall recommend to management to reprimand, to take disciplinary action, to impose penalty/punishment or to order recovery when any alleged unethical and improper practices or wrongful conduct is proved. Committee can also recommend termination or suspension of any contract or arrangement or transaction vitiated by such wrongful act. After investigations, if one is found to be innocent or not guilty, the outcome of investigation may be promptly communicated to him/her too.
4. The Ethical/Audit Committee shall ensure that the Whistle Blower is fully protected in terms of his/her identity and any retaliatory action against him/her. Any person, who may be found to be taking such retaliatory action against the whistle blower, will be subject to the strictest disciplinary action including termination, or for civil/ criminal or administrative penalties. All decisions of Ethical/Audit Committee shall be final and binding.
5. The Whistle Blower, members of ethical/audit Committee, members of investigation committee, subject and all other concerned involved in the process shall, maintain confidentiality of all information and discuss only to the extent or with those persons as required for completing the process of investigation.
6. This committee formed will continue to be in effect till there is any change in the members on account of resignation, retirement, change in their designation, or any change approved by Management of Farmson.

7. Any member of the Internal Committee who has an actual, potential, or perceived conflict of interest in relation to a Protected Disclosure shall recuse himself / herself from the review, investigation, and decision-making process for that matter

9. Procedure:

1. The disclosures in relation to above matters can be provided in strict confidentiality, documented as Protected Disclosures with reliable information, promptly by Whistle Blowers.
2. The protected disclosure should be submitted under a covering letter signed by the Whistle Blower bearing his/her identification in a closed and secured envelop superscribed as "Protected disclosure against ethical policy" or sent through e-mail with subject "Protected disclosure against ethical policy".
3. All protected disclosure should be addressed to the Chairperson of the internal committee who is also the Director, at info@farmson.com or hard copy can be sent at:
Sudhesh Mishra (Director & COO) Farmson Basic Drugs Pvt. Ltd.
14, GIDC Industrial Estate,
Nandesari, Vadodara- 391340
4. If a protected disclosure is received by any executive of the Company other than Chairman of Audit Committee, the same should be forwarded to the Chairperson of the Ethical/Audit committee who is also the Director for further appropriate action.
5. Appropriate care must be taken to keep the identity of the Whistleblower confidential.
6. Protected Disclosures should preferably be reported in writing to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistleblower.
7. Anonymous disclosures may be submitted and will be reviewed on a case-by-case basis, provided sufficient information and supporting details are available to enable a meaningful assessment and investigation. The decision to proceed with such disclosures shall rest with the Chairperson of the Ethics/Audit Committee.
8. The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the Whistleblower. The Chairman of the Audit Committee / Ethics Counsellor, as the case may shall detach the covering letter and forward only the Protected Disclosure to the Investigators for investigation.
9. Protected Disclosures should be factual and not speculative or in a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.
10. While whistleblowers are encouraged to disclose their identity to facilitate a thorough investigation, anonymous disclosures may also be considered where adequate information is provided to assess and investigate the matter

10. Investigation

1. FARMSON is committed to thoroughly investigate the protected disclosure promptly as a neutral fact-finding process to identify necessary actions as per the nature and gravity of the case.
2. A preliminary review of the Protected Disclosure should ordinarily be completed within 15 working days of receipt. Where a formal investigation is initiated, the investigation should ordinarily be completed within 60 to 90 days, unless extended due to the complexity of the matter, with reasons documented.

3. The Investigation committee shall have right to call for any information/ document and examination of any employee of the company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.
4. The Ethical/Audit Committee shall ensure that the Whistle Blower is fully protected in terms of his/her identity and any retaliatory action against him/her. Any person, who may be found to be taking such retaliatory action against the whistle blower, will be subject to the strictest disciplinary action including termination, or for civil/ criminal or administrative penalties.
5. The Whistle Blower, members of ethical/audit Committee, members of investigation committee, subject and all other concerned involved in the process shall, maintain confidentiality of all information and discuss only to the extent or with those persons as required for completing the process of investigation.

11. Decision:

1. If the Ethical/Audit Committee is satisfied that the alleged wrongful act existed or is in existence, then the Ethical/Audit Committee shall recommend to management to reprimand, to take disciplinary action, to impose penalty/punishment or to order recovery when any alleged unethical and improper practices or wrongful conduct is proved.
2. Committee can also recommend termination or suspension of any contract or arrangement or transaction vitiated by such wrongful act. After investigations, if one is found to be innocent or not guilty, the outcome of investigation may be promptly communicated to him/her too.
3. All decisions of Internal Committee shall be final and binding.

12. Reporting:

The outcome of the investigation shall be documented maintaining the confidentiality of whistle blower. Investigation committee shall prepare a report after completion of investigation and action to be taken thereof and shall present it to the Ethical/Audit Committee.

In addition, the Internal Committee shall review, on a periodic basis, the number, nature, status, and closure of concerns reported under this Policy, together with actions taken, and shall evaluate the effectiveness of the whistleblower mechanism. A summary update may be placed before the /Audit Committee on a quarterly basis.

13. Retention of Documents

All protected disclosures and results of investigation shall be retained by chairman of Ethical/Audit Committee for a minimum period of three years. A register for disclosures received and status of their outcome shall also be maintained. Measures to implement this policy and outcomes shall be reported annual report.

Review of Policy

The Policy shall be reviewed on or before 31st, March 2029.