

Whistle Blower Policy

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1. Introduction:

Aurore Group is committed to the highest standards of openness, probity, and accountability.

An important aspect of accountability and transparency is a mechanism to enable employees and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organization then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

Globally most of countries have laws which gives legal protection to employees against being dismissed or penalized by their employers because of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no members of employees should feel at a disadvantage in raising legitimate concerns.

The objective of 'Whistle Blower Policy' is to ensure highest ethical, moral and business standards in the course of functioning and to build a lasting and strong culture of Corporate Governance within the Company. In terms of Policy, an internal mechanism is established for staff members to report to the management, concerns about unethical behaviour, actual or suspected fraud or violation of the Company's Code of Conduct policy. The Policy is intended to encourage all employees of the Company to report suspected or actual occurrence of illegal, unethical or inappropriate actions, behaviour or practices by staff members without fear of retribution. The employees can voice their concerns on irregularities, malpractices and other misdemeanors through this policy. It also provides necessary safeguard and protection to the employees who disclose the instances of unethical practices/behaviour observed in the Company.

2. Coverage of the Policy:

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intend-ed to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns shall include:

- Financial malpractice or impropriety or fraud or Corruption or Bribery
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behavior
- Child or forced labor issues.
- Discrimination and harassment issues
- Attempts to conceal any of these

3. Safeguards:

Protection:

This policy offers the protection to the whistleblower (employees and directors) provided that the disclosure made / concern raised / allegations made (“complaint”) by a whistleblower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Group Values and/or Company’s Code of Conduct. In the reasonable belief of the whistle blower making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

4. Confidentiality:

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

5. Anonymous Allegations/ Reporting in Good faith:

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumors. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the following factors will be considered:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources
- Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

However, if a complaint, after an investigation proves to be frivolous, malicious or made with ulterior intent/motive, the Committee should take appropriate disciplinary or legal action against the concerned whistleblower.

List of Exclusions:

The following types of complaints will ordinarily not be considered and taken up:

- Complaints that are Illegible, if handwritten
- Complaints that are Trivial or frivolous in nature
- Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body

- Any matter that is very old from the date on which the act constituting violation, is alleged to have been committed.

Issue raised, relates to service matters or personal grievance (such as increment, promotion, appraisal etc)

6. Power of Amendment:

This policy will be amended at an appropriate time, as decided by the Management. The organization reserves the right to amend the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at the sole discretion of the Management.

ANNEXURE A - PROCEDURE FOR REPORTING & DEALING WITH DISCLOSURES

1. How should a Disclosure be made and to whom?

A Disclosure should be made in writing.
Letters can be submitted to whistle blower office

Whistle Blower Officer
AURORE LIFE SCIENCES PVT LTD.
Plot # 68 & 69, Floor 2, Jubilee Heights,
Hitech City, Near Shilparamam, Madhapur
Hyderabad - 500 081

All Protected Disclosures concerning financial/ accounting matters and those concerning the Whistle Officer and employees at the levels of Vice Presidents and above should be addressed to the whistleblower committee.

Audit Committee

Audit Committee
AURORE LIFE SCIENCES PVT LTD.
Plot # 68 & 69, Floor 2, Jubilee Heights,
Hitech City, Near Shilparamam, Madhapur
Hyderabad - 500 081

In respect of all other Protected Disclosures, it should be addressed to the Whistle Blower of the Company.

2. Is there any specific format for submitting the Disclosure?

While there is no specific format for submitting a Disclosure, the following details MUST be mentioned:

- i. Name, address and contact details of the Whistleblower (add Employee ID if the Whistleblower is an employee).
- ii. Brief description of the Malpractice, giving the names of those alleged to have committed or about to commit a Malpractice. Specific details such as time and place of occurrence are also important.
- iii. In case of letters, the disclosure should be sealed in an envelope marked "Whistle Blower" and addressed to the Whistle Officer OR the Audit Committee.

3. What will happen after the Disclosure is submitted?

- i. The Whistle Officer shall acknowledge receipt of the Disclosure as soon as possible (within 07 days of receipt of a Disclosure), where the Whistleblower has provided his/ her contact details.
- ii. The Whistle Officer will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the Disclosure constitute a Malpractice by discussing with the Audit Committee. If the Whistle Officer determines that the allegations do not constitute a Malpractice, he/she will record this finding with reasons and communicate the same to the Whistleblower.
- iii. If the Whistle Officer determines that the allegations constitute a Malpractice, he/she will proceed to investigate the Disclosure with the assistance of the Whistle Committee comprising of senior members from Human Resources, Internal Audit and a representative of the Division/ Department where the breach has occurred, as he/she deems necessary. If the alleged Malpractice is required by law to be dealt with under any other mechanism, the Whistle Officer shall refer the Disclosure to the appropriate authority under such mandated mechanism and seek a report on the findings from such authority.
- iv. Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- v. Subjects shall have a duty to co-operate with the Whistle Officer / Audit committee or any of the Investigators during investigation to the extent that such co-operation will not compromise self-incrimination protections available under the applicable laws.
- vi. The Whistle Officer / Audit committee may at his discretion, consider involving any Investigators for the purpose of investigation.
- vii. The investigation may involve study of documents and interviews with various individuals. Any person required to provide documents, access to systems and other information by the Whistle Officer or Whistle Committee for the purpose of such investigation shall do so. Individuals with whom the Whistle Officer or Whistle Committee requests an interview for the purposes of such investigation shall make themselves available for such interview at reasonable times and shall provide the necessary cooperation for such purpose.
- viii. If the Malpractice constitutes a criminal offence, the Whistle Officer will bring it to the notice of the Audit committee and take appropriate action including reporting the matter to the police.
- ix. The Whistle Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Whistle Officer as soon as practically possible and in any case, not later than 45 days from the date of receipt of the Disclosure. The Whistle Officer may allow additional time for submission of the report based on the circumstances of the case.
- x. Whilst it may be difficult for the Whistle Officer to keep the Whistleblower regularly updated on the progress of the investigations, he/she will keep the Whistleblower informed of the result of the investigations and its recommendations subject to any obligations of confidentiality.

- xi. The Whistle Officer will ensure action on the recommendations of the Whistle Committee/ Officer and keep the Whistleblower informed of the same. Though no timeframe is being specified for such action, the Company will endeavor to act as quickly as possible in cases of proved Malpractice.

4. What should I do if I face any retaliatory action or threats of retaliatory action as a result of making a Disclosure?

If you face any retaliatory action or threats of retaliatory action as a result of making a Disclosure, please inform the Whistle Officer in writing immediately. He/ She will treat reports of such actions or threats as a separate Disclosure and investigate the same accordingly and may also recommend appropriate steps to protect you from exposure to such retaliatory action and ensure implementation of such steps for your protection.

PROCESS FLOWCHART

