

## WHISTLE BLOWER POLICY

### Calibre Chemicals Private Limited (“Calibre”)

*(This Policy is applicable to Calibre Chemicals Private Limited as well as its subsidiaries, associates, Joint ventures)*

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#### **Introduction:**

Calibre believes in conducting its business activities in an ethical and lawful manner by adopting highest standards of integrity, and ethical practices. The objective of this Whistle Blower Policy (“**Policy**”) is to provide the stakeholders including employees, vendors and customers a framework and mechanism whereby they can report incidents of fraudulent nature or fraudulent practices or any other unfair incidents or practices not in line with the Company’s code of conduct or generally acceptable ethical and lawful behaviour.

The Company encourages all its stakeholders, who know or suspect any discrimination, harassment, victimization, or any unfair practices, which is not in line with the Company’s Code of Conduct or law of the land, to come forward and raise it through this Policy. This policy is an extension of the Company’s Code of Conduct and should be read with various policies under the Code of Conduct.

#### **Definitions:**

1. “**Audit Committee**” shall mean the Audit Committee of Calibre Chemicals Private Limited as formed by the Board of the Company from time to time.
2. “**Company**” shall mean Calibre Chemicals Private Limited and its subsidiaries, associates and joint ventures.
3. “**Complaint**” shall mean any communication that discloses or contains certain information by a written/oral communication through any channels, which evidences unethical, improper, fraudulent activity in relation to the Company.
4. “**Board**” shall mean the Board of Directors of the Company Calibre Chemicals Private Limited.
5. “**Disciplinary Action**” means any action that can be taken on the completion of / during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
6. “**Employee**” for the purpose of this Policy means every employee of the Company (whether working in India or abroad) and people employed on contractual basis.
7. “**Whistle Blower**” is a person who discloses a Complaint under this Policy.
8. “**Investigating Officer**” means the employee holding the position of the CEO or a Director on the Board of the Company, and responsible for receiving and investigating all complaints and any matter in connection therewith, as per directions, if any, by the Board of the Company.

### **Scope of this Policy:**

The scope of this policy covers any concern with respect to unlawful or unethical or improper or fraudulent practice or an act or activity that could have an impact on the performance of the business or reputation of the Company and may include, but is not limited to, any of the following:

1. Abuse of authority by an employee
2. Biased or favoured behaviour
3. Negligence causing danger to public health and safety and the environment
4. Manipulation of company data /records
5. Disclosure of confidential/ proprietary information to unauthorized personnel
6. Financial irregularities, including fraud
7. Wastage/misappropriation of company funds/assets
8. Breach of Code of Conduct of the Company or the Policy for Prevention of Sexual Harassment or any other rule or Policy as may be formulated by the Company from time to time

This Policy should not be misused by any person to make frivolous or malicious or bogus complaints to the Investigating officer. The Board may impose a penalty or decide that Disciplinary Action may be taken against such Whistle Blowers, who engage in making malicious or bogus complaints.

### **Procedure for making Complaint:**

1. **Employees:** Employees can make a Complaint to the Investigating officer, on becoming aware of any wrongful conduct or activity as covered under the scope of this policy, as soon as possible. In case, the Complaint is against the CEO, then the Complaint should be made to the Chairman of the Board of the Company.
2. **Stakeholders:** Any other Stakeholders including stakeholders from our customer or vendor partners can make Complaint to the Investigating officer which will be the CEO or in case of a Complaint against the CEO, the Chairman of the Board of the Company, on becoming aware of any wrongful conduct or activity as soon as possible
3. **Reporting Channel:** A complaint can be made in any of the following ways:
  - a. Through a call on the contact number as per **Annexure A**

Through a written email to the email id as mentioned in **Annexure A**

**Note:** Annexure A may be amended from time to time in case of any change in the CEO, Chairman, or their contact details, without requiring a formal amendment to this Policy.

The following points may be noted with respect to the above procedure:

- Complaints can be reported orally or on a phone conversation, however the investigator will subsequently be documenting the complaint for onward investigation.
- In case of a change in the designated investigator or the mobile number/email IDs of the designated investigator, it will be the responsibility of the CFO to revise this policy and appropriately circulate or host on a company portal for easy access to all employees and other stakeholders.

**4. Procedure:**

- i. A complaint should be made as far as possible in writing and in as much details as possible.
- ii. It is advisable that the Complainant should identify himself/herself in the complaint; however, in case the complainant doesn't want to disclose his/her identity, the investigator should ensure that the identity is not disclosed.

**Investigation:**

On receiving a Complaint, the Investigator will conduct an investigation in the following manner:

1. The Investigator on receiving a complaint will notify the details on the complaint to the Audit Committee of the Board of Calibre Chemicals, as early as practically possible through a written email.
2. Investigator will make an initial enquiry of the Complaint received to decide if the Complaint has any basis and whether the same should be taken up for further investigation or be dismissed
3. If the Investigator concludes that the Complaint has no basis, he/she will close the complaint by identifying it as a "bogus" or "malicious" complaint and sending a written document detailing the case and the investigation by an email to the Audit committee.
4. In case, the initial investigation indicates that the Complaint needs to be investigated further, then the Investigator may appoint such person or persons as they may consider necessary for conducting the investigation (hereinafter referred to as "Investigating Team").
5. The investigation shall be conducted in a fair manner and provide an equal opportunity for hearing to the affected party.
6. The Investigating Officer shall hold inquiry in the matter and shall submit a report to the Audit Committee not later than 30 days from the date on which the Complaint was received.
7. The Investigator may appoint external advisers as consultants for any assistance on the inquiry, if necessary.
8. On submission of report, the Audit Committee may take a disciplinary action as it may think fit.
9. A summary of all Complaints and the outcome of the investigation shall be reported periodically to the Board of Directors of the Company.

**Protection:**

It shall be ensured that the Whistle Blower, if he/she is an Employee, shall be protected from any adverse action that affects his/her employment in the company or future prospects of the employee in the Company or any other significant changes in his/her job, job profile, location, remuneration, rewards, benefits etc.

It shall be ensured that the Whistle Blower, being any other stakeholder, shall be protected from any adverse action which may include but is not limited to unfair termination of the contract, unfair withholding of payment or any other unfair act which may arise solely out of the concerned person making the Complaint.

The Whistle Blower, the Investigators and any other person involved in the investigation shall maintain complete confidentiality and secrecy of the matter, other than if required by any applicable law.

**Amendments:**

The board of directors of the Company shall have the authority to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever and communicating the same to the Employees or any other stakeholders of the Company.



A handwritten signature in black ink, appearing to read "Ravikant", with a horizontal line extending to the right.

Ravikant Annavarapu  
Chief Executive Officer

**Annexure A – Reporting Contact Details**

| Designation       | Name                     | Contact Number | Email ID                          |
|-------------------|--------------------------|----------------|-----------------------------------|
| CEO               | Mr. Ravikanth Annavarapu | 022-24330002   | whistletoceo@calibrechem.com      |
| Chairman of Board | Dr. Raman Ramachandran   | 022-67283003   | whistletochairman@calibrechem.com |

  
