



Whistle Blower Policy

CRYSTAL CROP PROTECTION LIMITED





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1 Objective

Crystal Crop Protection Limited (hereafter referred as “Company” or “Crystal” in this policy document) believes in highest standards of professionalism, honesty, integrity and ethical behavior.

The code of conduct defines the standards of behavior and relationships which the Company expects to exist within its employees and between its employees and its suppliers or other stakeholders. The Whistle-Blower Policy (“Policy”) as part of the Vigil Mechanism, mandated by the regulatory requirements has been defined to act as guidelines and safeguard against unjust accusations, unfair treatments and unfair practices against its employees, directors, ex-employees, vendors, suppliers and other stakeholders of the Company.

The purpose of the Policy is to build and strengthen culture of transparency and trust in the organization and to provide employees with a Whistle Blower Policy framework / procedure for responsible and secure reporting of improper activities (whistle blowing) within the company and to protect employees wishing to raise a concern about improper activity / serious irregularities within the Company.¹

2 Coverage of the policy

This policy is applicable to employees, directors, ex-employees, vendors, suppliers and other stakeholders of the Company, its subsidiaries and Modern Papers.²

3 Scope of the policy

The Company expects its employees, directors, ex-employees, vendors, suppliers and other stakeholders to report any conduct or behaviour that is divergent to the Company’s values and code of conduct including:

- i. Violation of Code of Conduct
 - a. Misuse of funds and assets of the Company
 - b. Inappropriate sharing of confidential information
 - c. Conflict of interest
 - d. Unfair dealings with suppliers, vendors and customers
 - e. Falsification of Company’s records
 - f. Anti-competitive practices
 - g. Violation of safety, health and environment guidelines
 - h. Any form of harassment at workplace excluding sexual harassment
 - i. Substance abuse
 - j. Acceptance of gifts and entertainment

¹ & ² amended on August 10, 2023, by the Audit Committee.





- ii. Inaccuracy in maintaining the Company's books of account and financial records
- iii. Financial fraud of any nature
- iv. False expense reimbursement
- v. Concurrent employment
- vi. Misuse of unpublished price sensitive information of the Company³

4 Responsibility

The Company encourages its stakeholder (e.g., employees, directors, ex-employees, vendors, suppliers etc.) to report concerns or grievances about unethical behavior, illegal acts or behavior inconsistent with the Company's values or Code of Ethics through this system.⁴

The Policy shall not be used as a substitute for the Company's normal grievance procedures or be a route for raising malicious or unfounded allegations against any Stakeholder of the Company. While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection will warrant disciplinary action. Whistle Blowers, who are found to have made three or more Protected Disclosures which were subsequently found to be mala fide, frivolous or malicious, shall be barred from making any further Protected Disclosures under this Policy. Further, the Audit Committee may initiate suitable action against the concerned Whistle Blower including a reprimand.⁵

5 Whistle-blower identity and confidentiality

The Company always encourages that the protected disclosures (complaints) are filed in the individual's own name, so that the persons handling the case will have the opportunity to ask additional questions and subsequently inform the complainant about how the investigation is proceeding. The Whistle Blower should therefore disclose his/ her identity while making such Protected Disclosures. No cognizance will be taken of any Protected Disclosure made anonymously and/or without proper signature.⁶

The Whistle-blower may choose to remain anonymous while reporting a complaint however disclosing the identity may help the Company during investigation and timely closure of the complaint. The Company will make no attempt to discover the identity of an anonymous whistle-blower. However, if the whistle-blower's identity becomes known during the course of the investigation, the Company will ensure that the identity of the whistle-blower will be kept anonymous and confidential to the extent possible, unless required by law or in legal proceedings.

³ Amended on May 15, 2019 by the Audit Committee.

^{4, 5 & 6} amended on August 10, 2023, by the Audit Committee.





Further, all inter-office correspondence in respect to investigation under the Policy will be done citing only the Unique Complaint Number (UCN) assigned to it and not in the name of Whistle Blower, thereby protecting the identity of the whistle blower.⁷

6 Procedure

A. Reporting Channels

The whistle-blower can use the following range of reporting channels for reporting any issue which is covered under the scope of the policy:

- a) To the Compliance Officer and/or Ombudsperson⁸ of the Company
 - i) Telephone no.: 011-47006800, Extn: 1489 (during 10 AM to 5 PM on Monday to Friday)
 - ii) Email ID: reachout@crystalcrop.com
 - iii) By Post: Compliance Officer, B-95, Wazirpur Industrial Area, Delhi-110052
- b) The Chairman of the Audit Committee (directly)
Email ID: acchairman@crystalcrop.com

B. Manner in which complaint can be raised⁹

The complaint should be factual (and not speculative in nature) and should contain to the maximum extent possible, the following information:

- The Director or Employee, and/ or other Stakeholder involved;
- The office/ unit of the Company where it happened
- When did it happen; date or a period of time;
- Nature of concern
- Any documentary evidence or proof, if available
- Whom to contact for more information
- Any other relevant information

- C. Where a Protected Disclosure is to be made, which involves CFO or MD or any Director of the Company, such Protected Disclosure may be made by any Stakeholder directly to the Chairperson of Audit Committee as per the Contact Details provided in para 6.A b) above. The Audit Committee shall appropriately and expeditiously investigate the Protected Disclosure including where necessary with the help of Investigators and determine appropriate action based on findings.

If any of the members of the Audit Committee have a conflict of interest in a given case, they would recuse themselves and the others in the Committee would deal with the matter on hand.

⁷ & ⁹ amended on August 10, 2023, by the Audit Committee.

⁸ As may be appointed by the Chairman of Audit Committee





D. Investigation

- i. Complaints in the form of protected disclosure received under this Policy will be opened in the presence of the Compliance Officer, Ombudsperson and/or any person authorised by the Audit Committee (collectively “Authorised Officials”). All Protected Disclosures reported under this Policy will be thoroughly investigated, unless the complaint is found to be clearly frivolous or malicious by the Authorised Officials. The identity of the Whistle Blower, the Subject and any other person assisting in the investigation, will be kept confidential.
- ii. Once, the Authorised Official(s) decides that this disclosure can be considered under the Whistle Blower Policy, the authorised official will enter it in a Corporate Register containing brief particulars of the disclosure received under this Policy and generate UCN.
- iii. Within a period of 15 days from the date of receipt of complaint/disclosure the Authorised official shall provide an acknowledgement.
- iv. The Authorised Official(s) may investigate the disclosure on his own or may take assistance from any External Party/Senior Official/Expert on the subject matter. Endeavour will be given to close the investigation and submit the final report to the Chairman of the Audit Committee within 30 days.

However, the Chairman of the Audit Committee can approve extension of this period up to another 30 days at the request of the Authorised Officials depending upon the nature and sensitivity of the complaint.

- v. The Chairman, after completion of the investigation, may recommend the matter for Disciplinary action or administrative action.
- vi. If there is any serious issue involved in any type of disclosure, the matter shall be brought to the notice of the Managing Director of the Company as well.

7 Interim Actions ¹⁰

During the pendency of the investigation, the Authorised Officials may recommend to the Management of Crystal to: -

- transfer/suspend the alleged official/person;
- confiscate all the records and devices from the alleged official/person for the purpose of investigation;
- restrain the alleged official/person to resume his/her duties or access the premises of the Company and its other offices;

any other actions as may be deemed necessary.

¹⁰ amended on August 10, 2023, by the Audit Committee.





8 Appointment of Ombudsperson

An Ombudsperson may be appointed by the Chairman of Audit Committee to investigate the matter and submit investigation report. If the whistle-blower has shared his/her identity, the Chairman of the Audit Committee at its own discretion and depending upon the severity of the issue may or may not disclose the whistle-blower identity with the Ombudsperson. The Ombudsperson will ensure that the identity of the whistle-blower will be kept anonymous and confidential to the extent possible, unless required by law or in legal proceedings. If the whistle-blower's identity becomes known during the course of the investigation, all efforts will be taken by the Company to protect the whistle-blower from any victimisation, retaliation, threat, intimidation, demotion or any harassment.

9 Protection for the whistle-blower

The Company believes that protection of the whistle-blower is essential for the success of whistle-blower mechanism. The Chairman of the Audit Committee will provide oversight to this initiative. The Company including Chairperson of the Audit Committee and Ombudsperson will ensure that whistle-blower is protected from any adverse action which includes discrimination, victimization, retaliation, demotion, threat, intimidation, harassment or adoption of any unfair employment practices.

Protection under this policy would not mean protection from disciplinary action arising out of false allegations made by a whistle-blower or if he/she is subject of a separate complaint or allegations related to any misconduct. The cases of such nature shall be referred to the HR department for necessary enquiry and disciplinary actions as per the Company policy.

10 Disqualifications of complaint

Apart from issues which are not covered under the "Scope of the policy", the Company reserves the right not to investigate a complaint where the complainant has not been able to provide information on less than 2 of the following;

- i. Location and timing of incident
- ii. Personnel involved
- iii. Specific evidence
- iv. When did the incident occur

11 Exclusions of the policy

- i. Matters relating to the terms and conditions of employment, shall be dealt with by the concerned HR personnel only.





- ii. Matters with respect to adequacy or need for infrastructure or facilities shall be dealt with by the concerned dealing officials in the administration department.
- iii. Matters regarding sexual harassment at workplace shall be reported to and be dealt with as prescribed under the Prevention of Sexual Harassment Policy of the Company and as per the mechanism laid down under The Sexual Harassment of Women at the Workplace Act & Rules 2013.

12 Management decision

The Company will take disciplinary or corrective action against the Subject as per the Company's disciplinary procedures and can also take legal action, if required if the complaint is found to be true. The Company expects the whistle-blower to support the Company and shall make himself/herself present before the Ombudsperson or available before any court/authority, if the Company decides to take action against the subject on behalf of his/her complaint. The Company reserves the right to make available or publish the findings of the whistle-blower complaints internally or through its website, about the decisions taken by the Company or by the Chairman of the Audit Committee.

The management on the recommendation of the Chairman of the Audit Committee may reward the whistle-blower at their discretion as they may deem fit and proper to do so.

In case of frivolous complaint(s) being filed by whistle-blower knowing clearly that the complaint has no evidence or on hearsay basis or fails to present before the Ombudsperson repeatedly or malafide intentions against the accused, the company may take suitable action against the whistle-blower as per the Company's disciplinary procedures.

The decision of the Company shall be considered as final and no challenge against the decision would be entertained, unless additional information becomes available or made available by whistle-blower.

13 Reporting and monitoring¹¹

The Company shall oversee the Whistle Blower mechanism through the Audit Committee. A report shall be submitted to the Audit Committee on quarterly basis about the Protected Disclosures received by them including their outcome and status.

14 Miscellaneous

The policy conforms to extant regulatory and statutory guidelines. Complaints which are not covered under the policy or fall under the purview of other Corporate

¹¹ amended on August 10, 2023, by the Audit Committee.





Policies, such as corporate HR policies, will be assigned as per the applicable policy and closure details shared with the Ombudsperson.

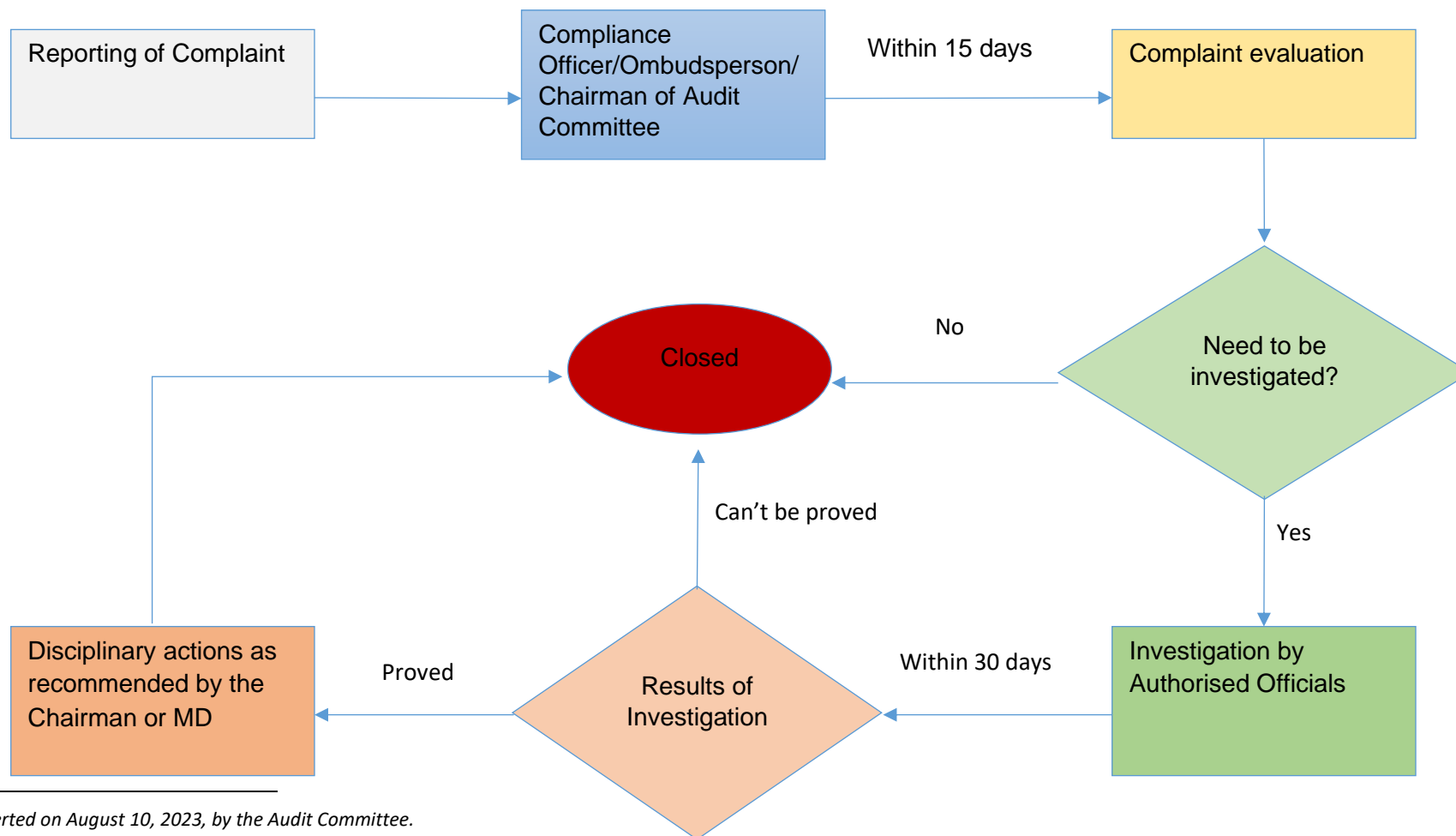
15 Right to amendment

The Company holds the right to amend or modify the policy. Any amendment or modification would be approved in writing by the Chairman of the Audit Committee.





FLOW CHART OF WHISTLEBLOWER SYSTEM¹²



¹² Inserted on August 10, 2023, by the Audit Committee.





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