farmson®
Basic Drugs Private Limited
RO : Plot No. 14, GIDC Ind. Estate, Nandesari, Dist. Vadodara - 391340. Gujarat, INDIA.
Ph.: 91-265- 2840092, 8511636622, 9898996756 • GSTIN : 24AAECF0045M2ZS
E-mail : info@farmson.com • Web : www.farmson.com • CIN : U24110GJ2020PTC112370

01/05/2024

WHISTLE BLOWER & ANTI-FRAUD POLICY

FARMSON group 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.

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 or unethical issues such child labour, misappropriation, forced labour, 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.

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 super scribed as "Protected disclosure against ethical policy" or sent through e-mail with subject "Protected disclosure against ethical policy". All protected disclosure should be addressed to the Chairperson of the Ethical/Audit committee who is also the Director, at hr@farmson.com or hard copy can be sent at:

Sudhesh Mishra (Director)
Farmson Basic Drugs Pvt. Ltd.,
14, GIDC Industrial Estate, Nandesari, Vadodara- 391340

The Chairperson of the Ethical/Audit 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 Ethical/Audit Committee. Anonymous disclosures will be investigated only in exceptional cases at the discretion of the Chairman Ethical/Audit Committee based on the prima facie substance in the case.

Farmson Group 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.

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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 and 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.

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.

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.

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.

This policy is applicable/effective to all units of Farmson Group from 01st May 2024. Next revision will be in 3 years i.e. on or before 30th April 2027 or as per requirements or revisions of applicable law of the land.

Sign and date

Sudhesh Mishra

Director- Farmson Basic Drugs Pvt. Ltd.

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FBDPL/ADM/2024
Dt- 01/05/2024

FORMATION OF COMMITTEE ON WHISTLEBLOWER POLICY OF FARMSON

In reference to the Whistle blower Policy of FARMSON, a committee is required to form to investigate the issues/complaints raised by the Whistle Blower and therefore this committee is formed.

The committee will consist of six persons, out of which there will be one Chairperson of the committee.
The present committee is as follows:

1) Mr. Sudhesh Mishra - Director as **Chairman** of Ethics Committee
2) Mrs. Sheela Nair - Manager Purchase - Committee Member
3) Dr. Prashant Shihora- Works Manager- Committee Member
4) Mr. Mayur Patel - Works Manager- Committee Member
5) Mr. Shailesh Rane - Works Manager- Committee Member
6) Mr. Anit Nair - Manager HR - Committee Member

The Key roles & responsibilities of the Ethics Committee will be as follows:

a) 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 will be investigated only in exceptional cases at the discretion of the Chairman of the Committee based on the prima facie substance in the case.

b) Farmson Group 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.

c) 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 and 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.

d) 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

Farmson Basic Drugs Pvt. Ltd. Nandesari

termination, or for civil/ criminal or administrative penalties. All decisions of Ethical/Audit Committee shall be final and binding.

e) 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.

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. This policy is applicable/effective to all units of Farmson Group from 01st May 2024. Next revision will be in 3 years i.e. 30th April 2027 or as per requirements or revisions of applicable law of the land.

Thanking you,

For **FARMSON BASIC DRUGS PVT. LTD.**

01/05/2024

Sign and date

Sudhesh Mishra

Director

Farmson Basic Drugs Pvt. Ltd. Nandesari