

HUMAN RESOURCE POLICY RASAPOORNA FOODS PVT. LTD.			
Applicable Locations	All Locations	HR Policy No.	RFPL/HO/HR
		Version	01
		Effective Date	01/04/2024
Title	Whistle Blower Policy	Review Date	31/03/2025
		Page	1 of 4

1. OBJECTIVE:

Rasapoorna Foods Pvt. Ltd. strives & adheres to keep high ethical standards for carrying out business. Accordingly, the Company has established a vigil mechanism for its employees to report genuine concerns and formulate this Whistle Blower Policy, providing a neutral and unbiased forum for any employees of the Company to voice concerns in a responsible and effective manner, where they discover information, which they believe shows serious malpractice, impropriety, abuse or misconduct, without fear of reprisal.

2. ELIGIBILITY:

All the employees of Rasapoorna Foods Pvt. Ltd. are covered under this policy.

3. WHAT CONSTITUTES COMPLAINT

Complaint means any written complaint made by any complainant and includes:

- i. Malpractice
- ii. Impropriety
- iii. Abuse
- iv. Wrongdoing
- v. Misconduct

Misconduct can include a whole variety of issues and some are listed below. However, this is not a comprehensive list but is intended to illustrate the sort of issues which may be raised under this policy.

- a) Fraud and corruption.
- b) Breaches of Copyright, patent, trademarks and disclosures of confidential data or information to competitors or outsiders.
- c) Any instance of any sort of financial malpractice & questionable accounting practices.
- d) Any other unethical or improper conduct.
- e) Misconduct with other Directors/Business Partners/employees or vulnerable adults (e.g. through physical, sexual, psychological or financial abuse, exploitation).
- f) Abuse of power (e.g. bullying/harassment).
- g) Bribe, corruption, money laundering or any sort of personal favours (in cash or kind) for awarding contracts/assignments/job opportunity, etc.

4. REPORTING & MANNER OF DEALING WITH COMPLAINTS

- i. **Reporting** – Any employee/business partner, who comes to know of an instance/action as mentioned in this policy, may make a complaint giving full details and evidence, if any, by sending a mail to the e-mail id hr@sarvanisweets.co.in
- a) All complaints received under this policy shall be reviewed by the Ombudsman. The action taken in response to a complaint under this policy shall depend on the nature of concern.

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		Page	2 of 4

- b) Initial Inquiries - Initial inquiries shall be made to determine whether an investigation is appropriate, and the form that it should take. Some complaints may be resolved without the need for investigation.
- c) Further Information -The amount of contact between the complainant and the person or persons investigating the concern shall depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the complainant.
- d) Any complaint deemed to be of a serious nature shall be investigated by an Investigation Committee/Member, appointed by the Ombudsman.
- e) All complaints shall be promptly and discreetly investigated, provided allegations are reasonably clear and specific. An investigation of vague or unspecified alleged wrongdoings without verifiable evidence adduced may not be undertaken. If any of the members of the designated investigative committee has a conflict of interest in the matter (i.e. there is a possibility that his/her/their personal interests may not ensure fair enquiry), he/she/they shall inform Ombudsman of the same, who may then appoint some other person(s) in his/her/their place in the Investigating Team.
- f) The investigations shall be conducted in such manner, at such time and at such venue as may be deemed appropriate by the Ombudsman.
- g) Office of the Ombudsman may take oral evidence or written statements of various persons including the complainant and may call for necessary documents in evidence. All Directors/employees/business partners of the Company shall have a duty to cooperate with investigations initiated under this Policy.
- h) Upon completion of investigation, in case of a proven complaint, the Ombudsman shall compile a report of the investigation conducted and shall present it to the Director.
- i) Complaints filed under this Policy shall be recorded in a Register with related documents. These documents may be inspected by the Director /Head-Human Resources or any other person as directed by them.
- ii. **Identity** -The complainant has a choice to disclose their identity to aid the investigation process, but they are under no compulsion to do so. In either case, the Company shall protect the identity of the complainant diligently unless
 - a) The complainant agrees to be identified
 - b) Identification is required by law

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		Page	3 of 4

5. DECISION

Where wrongful, unethical or illegal conduct is established on the part of any respondent, the Management shall take appropriate disciplinary or corrective action against such respondent, which could include termination of employment.

6. ASSURANCES UNDER THE POLICY & PROTECTION AGAINST RETALIATION

The Company shall not tolerate any harassment or victimization (including informal pressures) of/against the complainant and shall take appropriate action to protect them when they have made a complaint in good faith.

- i. The Ombudsman shall make all efforts to keep the identification of the complainant confidential.
- ii. The Company shall not retaliate and shall not allow any retaliation or discrimination of any kind against any complainant who submitted a complaint in good faith.
- iii. If a complainant has been victimized, discriminated or retaliated against, they may log a written complaint to the Ombudsman. Such complaints shall be investigated as deemed fit by the Ombudsman.

The above protection against victimization, retaliation or discrimination shall also be available to Directors/employees/business partners who offered evidence or made written statements or otherwise participated in the investigations.

7. WARNING

A complainant, who knowingly makes frivolous, misleading or false complaints, or without a reasonable belief as to the truth or accuracy of the complaint, shall not be protected by this policy and may be subject to disciplinary/legal action including reprimand/termination of employment/ contract / agreement /assignment/understanding. This shall also apply to those employees/business partners, who make false statements or give false evidence during the investigations.

8. REVIEW OF COMPLAINTS

A summary of complaints received under this policy along with the results of investigation and action taken, if any, shall be placed before the director on a quarterly basis for review. The report shall not contain any names.

9. AMENDMENTS

This policy supersedes all earlier policies made in this regard and company, at its sole discretion, may amend and modify the policy from time to time and may withdraw the policy any time without any notice.
