

## **WHISTLE BLOWER POLICY AND VIGIL MECHANISM**

*Pursuant to provisions of Section 177 (9) of the Companies Act, 2013 and rules made thereunder*

### **PREFACE:**

The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour.

### **OBJECTIVE:**

The purpose of this policy is to articulate the Company's point of view on whistle blowing, the process, and the procedure to strengthen Vigil Mechanism at the Company.

This Policy provides a platform and mechanism for the employees and directors to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.

It provides an environment that promotes responsible and protected whistle blowing process. It enables Employees and Directors about their duty to report any suspected violation of any law that applies to the Company and any suspected violation of the Group Values or the Company's Code of Conduct or insider trading norms.

Above all, it is a dynamic source of information about what may be going wrong at various levels within the Company and which will help the Company in realigning the processes and take corrective actions as part of good governance practice.

### **APPLICABILITY**

This policy is applicable to all employees and Directors.

This policy is equally applicable to Third parties to report a concern related to a potential violation of the Company Code of Conduct.

### **WHO IS A WHISTLE BLOWER?**

Any Employee or Director who discloses or demonstrates evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct. This whistleblower has come to the decision to make a disclosure or express a genuine concern/grievance/allegation, after a lot of thought.

### **PROTECTION:**

The process is designed to offer 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.

The Company affirms that it will not allow any whistleblower to be victimized for making any complaint. Any kind of victimization of the whistleblower brought to the notice will be treated as an act warranting disciplinary action.

A whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

As a Company, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against the whistleblowers. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

#### **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 rumor. This also means that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

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

#### **CONFIDENTIALITY:**

The Value Standards Committee will be treated in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.

#### **WHISTLE BLOWER OFFICER:**

For the purpose of this policy, the whistle blower officer will be Company Secretary (or in his/her absence, the Legal Head).

#### **PROCEDURE FOR RAISING A COMPLAINT:**

A whistle Blower can send a complaint to the Whistle Blower Officer at [compliance@accretionpharma.com](mailto:compliance@accretionpharma.com) or send physical complaint at Accretion Pharmaceuticals Limited, 29 Xcelon Ind Park 1, B/h Intas Pharmaceuticals, Vasna Chacharvadi, Sanand, Ahmedabad - 382213, Gujarat, India.

**GUIDELINES FOR COMMUNICATION AND IMPLEMENTATION OF THIS POLICY:**

Contact details will be made available for reporting of any violation or misconduct. A communication mechanism should be put in place to create awareness about this with the existing employees and for new joiners of the Company.

**REVIEW OF THE POLICY:**

The Board of directors of the company shall review the policy on timely basis.

**DISCLOSURE:**

The Policy is disclosed on Company's website i.e., [www.accretionpharma.com](http://www.accretionpharma.com)