

<b>Synthimed Labs Private Limited</b>		
<b>Policy No. 029</b>	<b>Human Resource Policy Manual</b>	<b>Effective Date</b>
<b>Revision No. 01</b>	<b>Whistle Blower Policy</b>	<b>01<sup>st</sup> June, 2024</b>

### **Introduction**

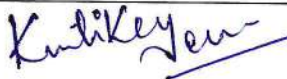
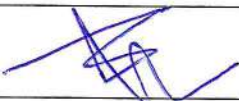
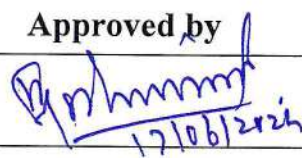
SLPL is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrong doing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

This policy gives protection to employees against being dismissed or penalised by any authority of the organisation as a result of disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by the Company, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

### **Scope of Policy**

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved by</b>
		
<b>Executive - HR</b>	<b>Sr. VP – People &amp; Culture</b>	<b>Managing Director</b>

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- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal confidential data of the organisation
- Any other misconduct or violations from the laid down policy/procedure of organisation.

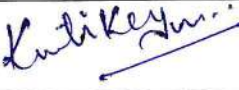
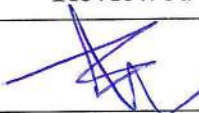
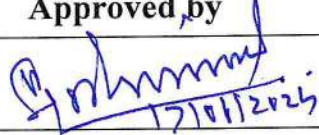
### Safeguards

Protection - This policy is designed to offer protection to those employees of SLPL who disclose such concerns provided the disclosure is made:

- In good faith
- In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

### Confidentiality

SLPL will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information

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		 17/01/2024
Executive - HR	Sr. VP – People & Culture	Managing Director

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and the individual making the disclosure may need to provide a statement as part of the evidence required.

### **Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

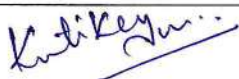
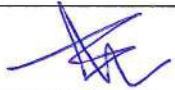
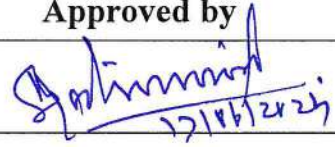
### **Untrue Allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

### **Procedures for Making a Disclosure**

On receipt of a complaint (Through any mode of communication) of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints against the COO/Dy COO should be passed to the MD who will nominate an appropriate internal / external investigating officer.

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<b>Executive - HR</b>	<b>Sr. VP – People &amp; Culture</b>	<b>Managing Director</b>

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- The complainant has the right to bypass the line management structure and take their complaint direct to the Managing Director. The Managing Director has the right to refer the complaint back to line management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.
- Information of all complaints will be passed on MD & company secretary desk.

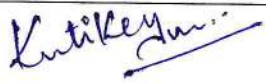

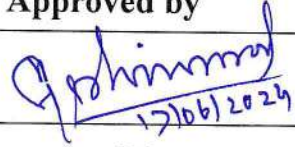
Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated and trained as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

1. Mr. Manpreet Singh (Human Resources)
2. Mr. Veenus Tondon (Finance & Accounts)
3. Ms. Bharti Sharma (Supply Chain)

If there is evidence of criminal activity, then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

#### **Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved by</b>
		 17/06/2024
<b>Executive - HR</b>	<b>Sr. VP – People &amp; Culture</b>	<b>Managing Director</b>

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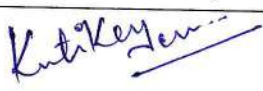

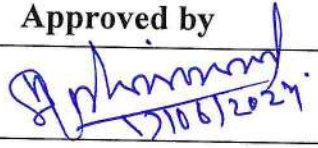
The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

Responses to the complainant should be in confidential manner, as per nature & requirement of complaints.

### **Investigating Procedure**

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff that against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by supervisor/worker representative or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the MD/Board of Directors/CEO/COO/Dy COO/Head HR/Company Secretary or any Senior leadership if appropriate
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings

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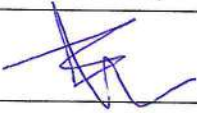
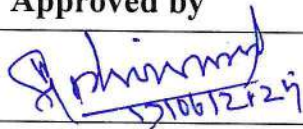
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of the investigations and reasons for the judgement. The report will be passed to the Managing Director/Board of Directors as appropriate.

- Managing Director/Board of Directors/CEO/COO will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, the outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the CEO desk, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, SLPL recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or body.

<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved by</b>
		 5/10/24
<b>Executive - HR</b>	<b>Sr. VP – People &amp; Culture</b>	<b>Managing Director</b>