

## WHISTLE BLOWER POLICY

### THE PURPOSE OF THIS POLICY

Blue Blends (India) Limited ("Company") and its subsidiaries (collectively the "Companies") are committed to complying with the laws that apply to them, the Code of Conduct of the Company and particularly to assuring that business is conducted with integrity and that the Company's financial information is accurate. If potential violations of Company policies or applicable laws are not recognized and addressed promptly, both the Company and those working for or with the Company could face governmental investigation, prosecution, fines, and other penalties. Consequentially, and to promote ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws. Employees and Directors may raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy (the "Policy" or the "Whistle blower Policy").

In case of any suspected violation of any law that applies to the Company and any suspected violation of the Company's Code of Conduct, an Employee or Director may report the same in the manner mentioned in this Policy.

Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action.

### SCOPE

Various stakeholders of the Company are eligible to make Protected Disclosures under the Policy. These stakeholders may fall into any of the following broad categories:

- a) Employees of the Company;
- b) Employees of other agencies deployed for the Companies activities, whether working from any of the Companies offices or any other location;
- c) Contractors, vendors, suppliers or agencies (or any of their employees) providing any material or service to the Company;
- d) Customers of the Company;
- e) Any other person having an association with the Company.

A person belonging to any of the above mentioned categories can avail of the channel provided by this Policy for raising an issue covered under this Policy.

### GUIDING PRINCIPLES

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

1. Ensure that the Whistleblower and/or the person processing the Protected Disclosure is not victimized for doing so;
2. Treat victimization as a serious matter, including initiating disciplinary action on person/(s) indulging in victimisation;
3. Ensure complete confidentiality;
4. Not attempt to conceal evidence of the Protected Disclosure;
5. Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made;
6. Provide an opportunity of being heard to the persons involved especially to the Subject;

### MALPRACTICES AND EVENTS:

1. Abuse of authority
2. Breach of contract

3. Negligence causing substantial and specific danger to public health and safety
4. Manipulation of company data/records
5. Financial irregularities, including fraud or suspected fraud or Deficiencies in Internal Control and check or deliberate error in preparations of Financial Statements or Misrepresentation of financial reports
6. Any unlawful act whether Criminal/ Civil
7. Pilferation of confidential/propriety information
8. Deliberate violation of law/regulation
9. Wastage/misappropriation of company funds/assets
10. Breach of Company Policy or failure to implement or comply with any approved Company Policy

Policy should not be used in place of the Company grievance procedures or be a route for raising malicious or unfounded allegations against colleagues.

### HOW TO REPORT

A report of suspected violation may be made either with name or anonymously to: [blueblends.ho@gmail.com](mailto:blueblends.ho@gmail.com) or by sending a letter with name or an anonymously letter to the Company Secretary at:

**BLUE BLENDS (INDIA) LIMITED**

2<sup>nd</sup> Floor, JBF House,  
Old Post Office Lane, Kalbadevi Road,  
Mumbai-400002

with a copy of such an e-mail or letter may also be sent to [blueblends.ho@gmail.com](mailto:blueblends.ho@gmail.com).

If you have reason to believe that the Managing Director, the Director, Finance or the Company Secretary is involved in the suspected violation, your report may be made in sealed envelope to the Audit Committee of Company Board of Directors (the "Audit Committee") at:

**CHAIRMAN, AUDIT COMMITTEE**

**BLUE BLENDS (INDIA) LIMITED**

2<sup>nd</sup> Floor, JBF House,  
Old Post Office Lane, Kalbadevi Road,  
Mumbai-400002

with a copy to [anandarya.compliance@gmail.com](mailto:anandarya.compliance@gmail.com)

If you have any complaint against the Chairman of the Audit Committee or the member of the Audit Committee, your report may be made in sealed envelope to Chairman, Blue Blends (India) Limited, 2<sup>nd</sup> Floor, JBF House, Old Post Office Lane, Kalbadevi Road, Mumbai-400002. Such complaints may also be made by e mail to [anandarya.compliance@gmail.com](mailto:anandarya.compliance@gmail.com)

A report should include maximum possible information about the suspected violation. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. The named reporting person may be contacted for further information.

### INVESTIGATIONS

All reports under this Policy will be promptly and appropriately investigated by a Committee of Managing Director, Director, Finance & Company Secretary or Chairman of the Audit Committee or the Chairman, as the case may be, with assistance of such other person, as they deem fit and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. An investigation will be a neutral fact finding process with evidence. Everyone working for or with the Company has a duty to cooperate in the investigation of reports of violations. Failure to co-operate in an investigation, or deliberately providing false information during an investigation, will be the basis for disciplinary action. If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy. Result of an investigation will be communicated to the complainant and may be disclosed to employees/public. Summary of all reports and actions taken will be tabled at Audit Committee meetings.

### RETALIATION IS NOT TOLERATED

No one may take any adverse action against any employee for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation with basis under this Policy. Incidents of retaliation against any employee reporting a violation or participating in the investigation of a reasonably suspected violation will result in appropriate disciplinary action against anyone responsible.

### CONFIDENTIALITY

Employees and Directors will maintain confidentiality obligations. Reporting in accordance with this Policy does not tantamount to breach of confidentiality obligations.

### MALICIOUS AND UNFOUNDED ALLEGATIONS

Employees and Directors are not to make malicious or unfounded allegations but may make allegations in good faith where there is reasonable ground of suspicion and basis.

### NO PROTECTION FROM ADVERSE ACTION

This policy does not protect an employee from an adverse or a disciplinary action taken independent of any disclosure made pursuant to this policy.

### TIME FRAME

The investigation shall be completed normally within 45 days of the receipt of the concern.

### COMPANY'S POWERS

The Company is entitled to amend, suspend or rescind this policy at any time. Whilst, the Company has made best efforts to define detailed procedures for implementation of this policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad intent of the policy. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this policy and further the objective of good corporate governance.

### ACTION IN TERMS OF OTHER LAWS

This policy does not prevent a person or the Company from taking an action under any applicable law.

### DOCUMENT RETENTION

All documents related to reporting, investigation and enforcement pursuant to this Policy may be retained by the Company.

### MODIFICATION

The Board of Directors of the Company can modify this Policy unilaterally at any time without notice.

### CONCLUSION

The Company Code of Conduct as well as the Company's policies and practices have been developed as a guide to our legal and the ethical responsibilities to achieve and maintain the business standards. Conduct that violates the Company's policies are viewed as unacceptable by the Company. Certain violations of Company's policies and practices could even subject to civil and criminal penalties. Before issues escalate to such level, personnel are encouraged to report any violations covered herein above, or reprisal, discriminations or adverse employment consequences related to such reports.