



CRYSTAL CROP PROTECTION LIMITED

Whistle Blower Policy

1 Objective

Crystal Crop Protection Limited and its subsidiaries and Modern Papers (hereafter referred as “company” in this policy document) believes in highest standards of professionalism, honesty, integrity and ethical behaviour.

The code of conduct defines the standards of behaviour and relationships which the company expects to exist with its employees and between its employees and its suppliers or other stakeholders. The whistle-blower policy as part of the Vigil Mechanism, mandated by the regulatory requirements has been defined to act as guidelines and safeguard against unjust accusations, unfair treatments and unfair practices against its employees, directors, ex-employees, vendors, suppliers and other stakeholders of the company.

2 Coverage of the policy

This policy is applicable to employees, directors, ex-employees, vendors, suppliers and other stakeholders of the company.

3 Scope of the policy

The company expects its employees, directors, ex-employees, vendors, suppliers and other stakeholders to report any conduct or behaviour that is divergent to the company’s values and code of conduct including:

- i. Violation of Code of Conduct
 - a. Misuse of company funds and assets
 - b. Inappropriate sharing of confidential information
 - c. Conflict of interest
 - d. Unfair dealings with suppliers, vendors and customers
 - e. Falsification of company record
 - f. Anti-competitive practices
 - g. Violation of safety, health and environment guidelines
 - h. Any form of harassment at workplace excluding sexual harassment
 - i. Substance abuse
 - j. Acceptance of gifts and entertainment





- ii. Inaccuracy in maintaining the company's books of account and financial records
- iii. Financial fraud of any nature
- iv. False expense reimbursement
- v. Concurrent employment
- vi. Misuse of unpublished price sensitive information of the Company¹

4 Whistle-blower identity and confidentiality

The Whistle-blower may choose to remain anonymous while reporting a complaint however disclosing the identity may help the company during investigation and timely closure of the complaint. The company will make no attempt to discover the identity of an anonymous whistle-blower. However, if the whistle-blower's identity becomes known during the course of the investigation, the company will ensure that the identity of the whistle-blower will be kept anonymous and confidential to the extent possible, unless required by law or in legal proceedings.

5 Reporting mechanism

The whistle-blower can use following range of reporting channels for reporting any issue which is covered under the scope of the policy:

Contact Person: Compliance Officer

S. No	Reporting Channel	Contact Information	Availability
1	Telephone	011-47006800 Extn: 1405	10 AM to 5 PM on Monday to Friday
2	Email	reachout@crystalcrop.com	24 x 7
3	Post	Compliance Officer, B-95, Wazirpur Industrial Area, Delhi-110052	24 x 7

The whistle-blower may reach out to chairman of the audit committee directly at acchairman@crystalcrop.com

¹ Amended on May 15, 2019 by the Audit Committee.





6 Appointment of Ombudsperson

An Ombudsperson may be appointed by the Chairman of Audit Committee to investigate the matter and submit investigation report. If the whistle-blower has shared his/her identity, the Chairman of the Audit Committee at its own discretion and depending upon the severity of the issue may or may not disclose the whistle-blower identity with the Ombudsperson. The Ombudsperson will ensure that the identity of the whistle-blower will be kept anonymous and confidential to the extent possible, unless required by law or in legal proceedings. If the whistle-blower's identity becomes known during the course of the investigation, all efforts will be taken by the company to protect the whistle-blower from any victimisation, retaliation, threat, intimidation, demotion or any harassment.

7 Protection for the whistle-blower

The company believes that protection of the whistle-blower is essential for the success of whistle-blower mechanism. The Chairman of the Audit Committee will provide oversight to this initiative. The company including Chairperson of the Audit Committee and Ombudsperson will ensure that whistle-blower is protected from any adverse action which includes discrimination, victimization, retaliation, demotion, threat, intimidation, harassment or adoption of any unfair employment practices.

Protection under this policy would not mean protection from disciplinary action arising out of false allegations made by a whistle-blower or if he/she is subject of a separate complaint or allegations related to any misconduct. The cases of such nature shall be referred to the HR department for necessary enquiry and disciplinary actions as per the company policy.

8 Disqualifications of complaint

Apart from issues which are not covered under the "Scope of the policy", the company reserves the right not to investigate a complaint where the complainant has not been able to provide information on less than 2 of the following;

- i. Location and timing of incident
- ii. Personnel involved
- iii. Specific evidence
- iv. When did the incident occur

9 Exclusions of the policy

- i. Matters relating to the terms and conditions of employment, shall be dealt with by the concerned HR personnel only.
- ii. Matters with respect to adequacy or need for infrastructure or facilities shall be dealt with by the concerned dealing officials in the administration department.





- iii. Matters regarding sexual harassment at workplace shall be reported to and be dealt with as prescribed under the Prevention of Sexual Harassment Policy of the company and as per the mechanism laid down under The Sexual Harassment of Women at the Workplace Act & Rules 2013.

10 Management decision

The company will take disciplinary or corrective action against the Subject as per the company's disciplinary procedures and can also take legal action, if required if the complaint is found to be true. The company expects the whistle-blower to support the company and shall make himself/herself present before the Ombudsperson or available before any court/authority, if the company decides to take action against the subject on behalf of his/her complaint. The company reserves the right to make available or publish the findings of the whistle-blower complaints internally or through its website, about the decisions taken by the company or by the Chairman of the Audit Committee.

The management on the recommendation of the Chairman of the Audit Committee may reward the whistle-blower at their discretion as they may deem fit and proper to do so.

In case of frivolous complaint(s) being filed by whistle-blower knowing clearly that the complaint has no evidence or on hearsay basis or fails to present before the Ombudsperson repeatedly or malafide intentions against the accused, the company may take suitable action against the whistle-blower as per the company's disciplinary procedures.

The decision of the company shall be considered as final and no challenge against the decision would be entertained, unless additional information becomes available or made available by whistle-blower.

11 Right to amendment

The Company holds the right to amend or modify the policy. Any amendment or modification would be approved in writing by the Chairman of the Audit Committee.

