



# Whistle Blower Policy

V2.0

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	<b>Department/Role</b>
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## 1. Whistle-blower Policy

### 1.1. Applicability

- (a) This policy applies to all Enzene stakeholders such as employees (whether permanent or on contract), investors, customers, vendors and other stakeholders.

### 1.2. Objective

- (a) Enzene believes that stakeholders are our most valuable asset and are critical to the success of our business. At Enzene, we are committed to foster an environment of honest and open communication and discussion, consistent with our values and code of conduct.
- (b) The objective of Whistle-blower Policy is to provide a platform for stakeholders (also referred in this document as “whistle-blower” or “person”) to raise any concerns (also referred in this document as “whistle-blow complaint”) in nature of ethical, moral and legal business conduct in line with Company’s code of conduct.

### 1.3. Whistle-blow complaint

- (a) A "whistle-blow complaint" is a complaint or concern where a Whistle Blower (person raising the Complaint) believes that Enzene (or an officer of Enzene) has, or may have, breached the Code of Conduct, Accounting, Internal Accounting Controls, Auditing Matters, and its best practices, and applicable national and international laws including statutory / regulatory rules and regulations.

### 1.4. Limitations and exclusions from policy

- (a) The following points cannot be covered as part of Whistle-blow complaint:
  - Compensation related issues like quantum of increments, bonus payouts, etc.
  - Queries relating to deduction of tax from salary, etc.
  - Inappropriate administration services e.g. quality of food, malfunctioning of phones, etc.
  - Malfunctioning of information technology assets like laptop, printers, etc.
  - Queries relating to job openings, internal transfers, etc.
  - Commercial and economic decisions taken by the management
  - Sexual harassment (as it is separately covered in Enzene's policy on Prevention of Sexual harassment at workplace)

### 1.5. Reporting Channels & Mechanism

- (a) Any stakeholder can report or address their concerns (or whistle-blow complaint) through following channels:
  - Voicemail: 1800 266 0208
  - Email: [ethics@enzene.com](mailto:ethics@enzene.com)
- (b) In exceptional cases, if a complainant wishes to report a concern directly to the Chairman of the Audit Committee, they may do so via email at [audit.chair@enzene.com](mailto:audit.chair@enzene.com). For such complaints, it is mandatory for the complainant to disclose their identity and provide contact information. The Chairman may choose to speak with the complainant before deciding whether to initiate a review or investigation.
- (c) The whistle-blower may choose to remain anonymous. However, for a thorough and effective investigation, the disclosure of identity is encouraged. While anonymous complaints will be sincerely reviewed, disclosure of identity can significantly enhance the ability to investigate the concern appropriately. The identity of the whistle-blower will be maintained in strict confidence, to the maximum extent reasonably possible.
- (d) There is no time limit for reporting the concern. However, the concerns should be reported at the earliest possible preferably immediately after occurrence.

- (e) It is important that stakeholders speak up or specify complete details concerning the complaint and also provide any supporting document, so that complaint is addressed in a proper manner. The Company will strive to maintain confidentiality to the greatest extent possible and discussion of the item should be limited to only those individuals with a “need to know.”
- (f) It is encouraged to first talk to an appropriate supervisor if you have a question or a concern. There may be times when you prefer to use another avenue for addressing issues. In these cases, you may speak with others or write, including:
  - the next higher level of supervision; or
  - your operating unit head; or
  - your local Human Resources representative; or
  - any member of Vigil committee:
- (g) Concerned employee receiving written communication from a whistle-blower needs to acknowledge; and initiate action or escalate to Vigil Committee within 24 hours of receiving such communication. These discussions will also be treated confidentially as defined above, and individuals who participate in investigations will be protected from retaliation.

#### **1.6. Formulation of the Vigil Committee**

- (a) For the purpose of the Vigil mechanism a high-level committee is formed, herein referred to as ‘Vigil Committee’ who shall receive all whistle-blow complaints through hotline or email. The committee shall have the following members:
  - Chief Executive Officer (CEO) & Whole time Director
  - Human Resource Department Head
  - Chief Financial Officer (CFO)
  - Company Secretary and Legal
  - Any other senior member as prescribed by the Board of Directors
- (b) The chairperson of the committee shall be defined by the Board of Directors.
- (c) It is the responsibility of Vigil committee to:
  - Ensure that stakeholders are made aware of this Policy and Enzene’s commitment to it;
  - Create an environment in which any stakeholder can raise what they believe to be honest issues to any level of leadership without fear of retaliation; and
  - Fully cooperate and respond in a timely and professional manner

#### **1.7. Dealing with the concern & reporting**

The concerns reported shall be dealt in the following manner:

- (a) All concerns raised through the reporting channel will be reviewed by the Vigil Committee
- (b) The Vigil Committee will conduct a preliminary review within 72 working hours to check if the concern falls under this Policy. If the complaint involves a potential financial impact of more than INR 1 crore, the Chairperson of the Audit Committee will automatically act as the Chairperson of the Vigil Committee for that case and decide the next steps. Based on the preliminary review, the Vigil Committee (or Audit Committee Chairperson, if applicable) will decide how to proceed. This may include:
  - Setting up an internal investigation team; or
  - Engaging an external investigation agency.
- (c) If the concern is raised against a member of the Vigil Committee, Board of Directors, or Audit Committee, that person will not be involved in the review or investigation of that case.
- (d) If more information is needed, the whistleblower may be contacted. If the whistleblower does not respond or refuses to provide necessary details, the Committee may decide to close the case.
- (e) A summary of the preliminary review and investigation findings will be shared with the Audit Committee and the Board of Directors. If a Director is involved in the concern, they will be excluded from the discussion.

- (f) The Company Secretary will present a regular update at each Audit Committee and Board meeting, including the number of complaints received and their current status (such as under review, closed, under investigation, or resolved).

### **1.8. Confidentiality**

- (a) The Company is committed to maintaining the highest level of confidentiality in relation to whistle-blow complaint and related investigations. All complaints, reports, and associated information shall be treated as confidential and disclosed only on a strict need-to-know basis for the purposes of investigation, resolution, or legal compliance.
- (b) The identity of the whistleblower shall be kept confidential to the maximum extent practicable and permitted by applicable law. Disclosure of the whistleblower's identity may only occur under the following circumstances:
  - Where disclosure is required by applicable law, regulation, or a legal proceeding;
  - When necessary for a fair and thorough investigation;
  - With the express written consent of the whistleblower.
- (c) All individuals involved in handling, receiving, or investigating complaints, including members of the Vigil Committee, supervisors, witnesses, and subject(s) of the complaint are required to maintain strict confidentiality. Unauthorized disclosure of any information related to a whistle-blow complaint or investigation will be considered a serious violation of this Policy and may result in disciplinary action, including termination of employment or legal consequences.
- (d) Whistle-blowers are also expected to maintain the confidentiality of the complaint to the extent possible. They should refrain from discussing the matter with colleagues or third parties, except as required for reporting purposes or if legally advised. Breach of this obligation may undermine the integrity of the investigation and, in certain cases, may result in appropriate action.
- (e) The obligation of confidentiality applies during the investigation process and continues even after the conclusion of the investigation or the individual's association with the Company.

## **2. Whistle-Blower Protection and Retaliation**

### **2.1. Whistleblower Protection**

- (a) Enzene is committed to protecting any individual—employee, contractor, or stakeholder—who, in good faith, reports a concern, seeks advice, or provides information regarding potential misconduct or violations of policy or law.
- (b) Any person who raises a concern with honest intent and a reasonable belief in its accuracy, even if the concern is later found to be unsubstantiated, shall not face any adverse consequences.
- (c) Whistleblowers are encouraged to come forward without fear. The fact that a concern was raised in good faith shall not form the basis for denial of benefits, demotion, suspension, dismissal, threats, harassment, discrimination, or any other negative employment action.

### **2.2. Retaliation**

- (a) Retaliation refers to any adverse action taken against an individual as a result of their protected disclosure or participation in an investigation. Examples of retaliatory actions include:
  - Denial of promotion
  - Disciplinary action
  - Undesirable transfer, reassignment, or change in responsibilities
  - Unfavorable performance appraisal
  - Reduction in pay, benefits, or rewards

- Hostile changes to working conditions or duties
- (b) Retaliation in any form is strictly prohibited. If any employee, contingent worker, or stakeholder is found to have retaliated against a whistleblower acting in good faith, Enzene will take appropriate disciplinary action, which may include termination of employment or legal recourse.
- (c) However, if a report is found to be intentionally false or maliciously made, the Company reserves the right to take appropriate action against the person making such a report.
- (d) If you believe you have been subjected to retaliation—or have witnessed retaliation—after raising a concern in good faith, you are encouraged to report it immediately to the Vigil Committee.

**3. Consequences of non-compliance**

- (a) Violations of this procedure may result in disciplinary action up to and including termination. Contingent workers will be subject to discipline according to the terms and conditions of the agreement with the contracted service provider.

**4. False Reporting**

- (a) If at any time, it is revealed that the concern was raised with mala-fide intent, then the person reporting it will be subjected to disciplinary action, including termination of employment.

**5. Retention**

- (a) Documents received/generated during the course of reporting, investigation and enforcement pursuant to this Policy, shall be retained as per Enzene’s record retention policy and applicable local or international laws or regulations.

**6. Amendment to the policy**

- (a) The policy may be amended with the approval of Board of directors. Amendments may be necessary to comply with laws or regulations or for any other business reasons.

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