

WHISTLE BLOWER POLICY

Policy: Whistle Blower Policy	Policy version: 1.0
Date of issue: 6-11-2023	Authorized by: Mr. Vaibhav Garg
Effective from: 6-11-2023	Adopted by: Board Resolution dated 6-11-2023

1. BACKGROUND

Fibmold Packaging Private Limited (“**Company**”) is committed towards adhering to the highest standards of ethical, moral and legal conduct of business operations. In order to maintain these standards, the Company encourages its employees, directors and stakeholders who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

The Whistle Blower Policy (“**Policy**”) has been framed in consonance with the applicable laws including the provisions of the Whistle Blowers Protection Act, 2014 and the Companies Act, 2013, as may be amended on date from time to time. The Policy intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company. The Policy neither releases the employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

2. OBJECTIVE

The objective of this Policy is to provide the procedure to strengthen the whistle blowing mechanism in the Company and to provide for adequate safeguards against victimization of director(s)/ employee(s) who avail of the mechanism.

3. APPLICABILITY

This Policy extends to all employees, staff and directors of the Company (“**Person**”) and comes into effect from 6th November, 2023.

4. REPORTING

4.1. If a Person believes in good faith or has any concerns relating to any actual or potential illegal or unethical practices in finance, accounting, internal control, free competition or any other aspect of operations or management of the Company, he/she shall report his/her concerns under this Policy in writing to the Vigilance Officer. When in doubt whether an activity or behaviour is a violation or not, the Person shall report the same as well.

4.2. Some indicative examples of incidences which are to be reported are as below:

- a. harassment or discrimination and workplace violence;
- b. breach of confidentiality obligations and intellectual property; whether belonging to the Company or any third party;

- c. breach of data privacy;
 - d. fraud or questionable accounting/financial reporting;
 - e. corruption or improper/illegal transactions;
 - f. improper promotion and improper sales practices;
 - g. conflicts of interest;
 - h. theft or misuse of the Company's assets; and
 - i. any other illegal or unethical practices.
- 4.3. A concern or complaint shall include the brief description of the illegal/ethical action, giving the names of those alleged to have committed or about to commit such action. Specific details such as time and place of occurrence are also important. The concern/complaint shall be sealed in an envelope marked "Whistle Blower" and addressed to Mr. Vaibhav Garg, Director of the Company at Fibmold Packaging Private Limited, Unit No. 202, Tower A, Peninsula Business Park, Senapati Bapat Marg, Lower Parel, Mumbai - 400013, Maharashtra, India, ("**Vigilance Officer**") and a soft copy of the complaint shall also be sent to the business integrity manager of Omnivore Agritech & Climate Sustainability Fund 3 (being one of the investors of the Company), i.e., at the following email address: complaints@omnivore.vc.

5. VIGILANCE OFFICER AND HEAD

- 5.1. All complaints shall be sent to the Vigilance Officer in writing and under exceptional circumstances a complaint can also be sent directly to Mr. Param Gandhi ("**Vigilance Head**") on the following email address param@fibmold.com, with a copy marked to info@fibmold.com.

6. WHISTLEBLOWER COMMITTEE

- 6.1. The Whistleblower Committee comprises of the following members:
- a. Mr. Vaibhav Garg;
 - b. Mr. Param Gandhi;
 - c. Mr. Deebu Madhavan.
- 6.2. If any of the members of the Whistleblower Committee have a conflict of interest in a given case, such member should recuse himself/herself and the others on the Whistleblower Committee would deal with the matter on hand.

7. INVESTIGATION AND DISCIPLINARY ACTION

- 7.1. The Vigilance Officer will take effective steps to respond to any concern which has been reported within 10 (Ten) days. The Person raising such concern will also be informed of the outcome of the investigation. In case detailed investigation needs to be conducted, the Whistleblower Committee after discussion with the Vigilance Head, may direct such investigation to be conducted, if necessary, by an independent external agency. The Vigilance Officer would be responsible to obtain such internal approvals as may be required. The investigation process shall be completed with a period of 45 (Forty Five) days from date of commencement of the investigation.

- 7.2. The Person(s) against whom a concern or complaint is made will have the right to be heard and the Vigilance Officer and/or the Whistleblower Committee must give adequate time and opportunity for such Person to defend his/her actions. Such Person shall have the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry/ investigation process. However, the Person shall not have the right to ask for or be given information about the identity of the Person who had raised the concern/complaint, even if it is available.
- 7.3. On the completion of the investigation, the Whistle Blower Committee/ external agency and/or the Vigilance Officer in consultation with the Vigilance Head, will provide a report of its findings to the Board of Directors of the Company, within a period of 30 (Thirty) days from the date of completion of the investigation.
- 7.4. The Board of Directors of the Company shall act upon the above recommendation within 30 (Thirty) days of its receipt by them and all such recommendations will be in accordance with applicable laws. The punishment for such offences shall constitute a minimum of written warning and may lead to withdrawal of last increment, demotion, withholding promotion, dismissal from services and/or prosecution in a court of law, depending on the severity of the illegal/unethical action.
- 7.5. In case, where a concern is raised with deliberate and/or ill motive to tarnish the reputation of employee/s and department/s of the Company or in case of repeated frivolous complaints, the Person raising such concern will undergo the investigation process and disciplinary action. This Policy may not be used as a defence by an employee against whom an adverse personnel action has been taken independent of any disclosure made by him for legitimate reasons or cause under Company rules and policies.

8. IDENTITY OF THE COMPLAINANT

Members of the Board of Directors and employees are encouraged to report the incident by identifying themselves in the complaint report. In case the Person does not wish to disclose his/her identity, an anonymous report can be submitted. It is the responsibility of each Person to report an incident regardless of the choice of disclosing or not disclosing his/ her identity. The identity of the Person will be kept confidential if asked to do so and will be disclosed only if it becomes necessary for investigation purposes or in certain circumstances where it is legally required to be so disclosed.

9. NO RETALIATION

There will be no retaliatory action against any Person who has reported any incident of non-compliance in good faith, using any appropriate channel of communication as provided for in this policy. Complete protection will be given to such Person against unfair practices like threat or intimidation or termination/ suspension of service, disciplinary action, transfer, demotion or refusal of promotion, including any direct or indirect use of authority to obstruct such Person's right to continue to perform his/her duties or functions in a free and fair manner.

10. MAINTENANCE OF RECORDS

- 10.1. The Whistleblower Committee shall maintain a record of the number of complaints received, action taken on the complaints and results of investigations, if carried out. Such records shall be available to be submitted to any government authority, if so required as per any applicable law.
- 10.2. All the documents in relation to concerns received and gathered during investigations shall be kept by the Vigilance Officer for a period of 5 (five) years.

11. RESPONSIBILITY, MONITORING AND REVIEW

- 11.1. The compliance/human resource team is responsible for this Policy and for monitoring its use and effectiveness (and dealing with any queries on its interpretation). Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this Policy and attend regular training on how to implement and adhere to it.
- 11.2. Every person to whom this Policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrong-doing.
- 11.3. A quarterly status report on the total number of complaints received during the period, with summary of the findings of the Whistleblower Committee and the corrective actions taken will be sent to the Vigilance Head and the Board of Directors of the Company.

12. MODIFICATIONS TO THE POLICY

- 12.1. The Board of Directors of the Company in consultation with Omnivore Agritech & Climate Sustainability Fund 3, reserves the right to alter, add to, vary or substitute any of the provisions of the Policy at any time. However, no such alteration, addition, variation or substitution shall be inconsistent with the provisions of any applicable law for the time being in force.
- 12.2. If any of the provisions contained herein are found to be invalid, illegal or unenforceable in any respect, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired.

For and on behalf of
Fibmold Packaging Private Limited

Sd/-
Name: Vaibhav Garg
Designation: Director

REPORTING CONCERNS AND SEEKING GUIDANCE

Additional guidance can be sought by contacting a Human Resources representative.

MANAGEMENT’S RIGHTS

The Company, in consultation with Omnivore Agritech & Climate Sustainability Fund 3, reserves the exclusive right to interpret, administer and apply this Policy, and to change this Policy at any time and for any reason.

This Policy is not intended to create contractual obligations. The Company, in consultation with Omnivore Agritech & Climate Sustainability Fund 3, reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of Fibmold Packaging Private Limited, whether written or oral, on the topics covered in this Policy.

