RishiFIBC SOLUTIONS PVT. LTD.
[EXPORT ORIENTED UNDERTAKING]

Whistle Blower Policy

1. PREFACE

a) Rishi FIBC Solutions Private Limited (hereinafter referred to as "the Company") is committed to conducting its business with the highest standards of professional integrity and ethical behavior, in full compliance with all applicable laws and regulations. The Whistle Blower Policy serves as a mechanism to reinforce the implementation of the Company's Code of Conduct, encouraging all stakeholders to take actions that align with the Company's values and beliefs, and are perceived as such. Employees and Directors are expected to report any violations of the Code under this Policy. Through this Policy, the Company provides a clear procedure for Employees and Directors to disclose concerns about any Improper Acts. The Company ensures that adequate safeguards are in place to protect Whistle Blowers from victimization when making Protected Disclosures.

b) Sections 177(9) and (10) of the Companies Act mandate that certain companies establish a vigil mechanism, known as the "Whistle Blower Policy," for all Employees and Directors to report Improper Acts. Accordingly, this Policy has been formulated to provide such a mechanism.

2. OBJECTIVE

a) To provide all Employees and Directors a mechanism to report Improper Acts.

b) To provide adequate safeguards against victimization for making Protected Disclosures.

3. SCOPE

This policy serves as an extension of the Company's Code of Conduct & HR Manual. The role of a Whistle Blower is that of a reporting party who provides reliable information. A Whistle Blower is not required or expected to act as an investigator or to determine the facts, nor do they have the right to participate in any investigative activities unless specifically requested by the Investigator.

4. ELIGIBILITY

All Employees and Directors of the Company are eligible to make Protected Disclosures under the Policy.

5. DISQUALIFICATION

a) Any misuse of the protection provided to the Whistle Blower under this Policy will result in disciplinary action.

b) If any individual is found to be abusing this Whistle Blower Policy by making disclosures that are determined to be malicious, baseless, frivolous, or made in bad faith, that person will be disqualified from making any further Protected Disclosures under this Policy.

6. PROCEDURE

a) All Protected Disclosures should be directed to Mr. Arvindkumar N. Nopany and Mr. Joseph Fransis based on the significance and gravity of the complaints.

b) The contact details for reporting Protected Disclosures are as follows:

Corp. Office:
Mahuvad - Ranu Road, Ranu
Vadodara - 391 440, Gujarat, INDIA
Tel.: +91-2662-305 000, Fax: +91-2662-305 015
Email: mail@rishifibc.com, url: www.rishifibc.com

c) Protected Disclosures must be submitted in writing to ensure a clear understanding of the issues raised. They should be typed or handwritten in legible English, Hindi, or the regional language of the Whistle Blower's place of employment.

d) Protected Disclosures should be accompanied by a covering letter that includes the Whistle Blower's identity. The Directors will remove the covering letter and the Whistle Blower's identity before forwarding the matter to the Investigator.

e) Anonymous disclosures will not be considered under this Policy.

8. INVESTIGATION

a) All Protected Disclosures received will be recorded and reviewed by Mr. Arvindkumar N. Nopany and Mr. Joseph Fransis. If initial inquiries by the members suggest that the Protected Disclosure lacks merit or does not fall under this Policy, it may be dismissed at this stage. The matter will then be forwarded to the Board of Directors, with a documented decision and justification. In such cases, the members will provide the Whistle Blower with feedback explaining the reasons for dismissal. The members will aim to complete these steps within 15 working days from the date of receipt of the Protected Disclosure.

b) If initial inquiries suggest that further investigation is warranted, the members will either conduct the investigation personally or establish an Investigation Committee. If an Investigation Committee is formed, it will be established within 7 working days of the decision to proceed with the investigation.

c) The investigation will be conducted impartially, as a neutral fact-finding process, without presuming guilt. To the extent possible, the members or the Investigation Committee will aim to complete the investigation within 30 working days from its commencement and will provide a written report of the findings upon conclusion.

9. PROTECTION

a) No Whistle Blower shall face unfair treatment for reporting a Protected Disclosure under this Policy. The Company strictly condemns any form of discrimination, harassment, victimization, or unfair employment practices directed at any Whistle Blower.

b) If a Whistle Blower experiences any violation of this provision, they may report it to the members, who will promptly investigate the matter.

10. INVESTIGATOR

a) Investigators are responsible for conducting a thorough fact-finding process with detailed analysis and reasoning. They derive their authority and rights from the members during the investigation.

b) Investigations will be initiated only after the members has conducted a preliminary review and determined that an investigation is warranted under this Policy.

11. DECISION

If an investigation finds that an Improper Act has occurred, the members will recommend corrective or disciplinary action to the Board of Directors, as deemed appropriate.

12. REPORTING

The members shall submit a report on all Protected Disclosures referred to him, including the results of the investigation, to the Managing Director and the Board of Directors of the Company.

13. RETENTION OF DOCUMENTS

All Protected Disclosures, documentation in relation to the Investigation, and the results of the Investigation shall be retained by the Company for a minimum period of 3 years.

14. COMMUNICATION OF THIS POLICY

For all new Employees and Directors, a copy of this Policy will be provided as part of the joining documentation, along with other HR-related policies. For existing Employees and Directors, a copy of this Policy will be distributed within one month of its adoption by the Board of Directors. Additionally, this Policy will be posted on the Company's website and included in the Directors' Report.

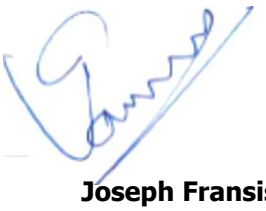
Effective Date: 23.02.2022

Approved by the Board of Directors

Last Review Dated: 20.01.2026

Arvind Nopany

Managing Director



Joseph Fransis

Executive Director & CEO

Version	Date
Version 01	23.02.2022
Version 02	30.01.2023
Version 03	15.02.2025
Version 04	20.01.2026

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