

## **WHISTLE BLOWER POLICY OF PRIMA AGRO LIMITED**

### **BACKGROUND**

Prima Agro Limited (the “Company”) believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior.

Section 177 of the Companies Act, 2013 (“Companies Act”) and Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) require each listed company to establish a vigil mechanism for directors and employees to report genuine concerns or grievances. Accordingly, this Whistleblower Policy (“the Policy”) has been formulated with a view to provide a mechanism for Directors and Employees of the Company to approach the Ethics Counsellor / Chairperson of the Audit Committee of the Company.

### **SCOPE**

The purpose of this whistle blower policy (“Policy”) is to provide a framework to promote responsible and secure whistle blowing. It protects all stakeholders including directors and employees wishing to raise a concern about serious irregularities within the Company from being victimized/ harassed, including by the superiors as also prohibition of leak of unpublished price sensitive information. This Policy should neither be a route for taking up grievances about a personal problem/issue nor be route for raising unfounded or frivolous allegations against colleagues.

### **APPLICABILITY**

All stakeholders, directors, employees and any union/ association of employees of the Company are covered under this policy.

### **WHISTLEBLOWER PROCESS**

- A Whistle Blower can raise a concern with the Vigilance officer by sending an e-mail to [primaedayar@gmail.com](mailto:primaedayar@gmail.com)
- All whistleblower complaints received shall be reviewed by the will respond to the concern within 48 working hours of receiving it.
- The Whistle Blower may disclose his/her identity and the Company would provide protection against retaliation.
- Once the assessment is made the Vigilance officer will contact the Associate/Customer/Vendor to obtain the information necessary to conduct an effective investigation.
- The Vigilance officer will provide feedback to the Whistle Blower on the progress of the investigation.
- The Vigilance officer shall submit a report of all the complaints received during a quarter to the Board of directors in the first Board meeting held in the following quarter or such other Board meeting at the direction of the Board.

**VIGILANCE OFFICER**

The Company secretary of the Company acts as the Vigilance officer and he is primarily responsible for overseeing and managing compliance issues within the organization. He is in charge of ensuring, that the company and its Associates are complying with internal policies and procedures.

**AMENDMENT**

The Board of directors of the company reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.

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