



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

HR DEPARTMENT	PAGE NO	Page 1 of 4
TITLE: Whistleblower Policy	DOC. NO.	RFL/EHS/PR/47
	REV. NO.	00
	EFFECTIVE DATE	20/08/2024
	REVIEW DATE	19/08/2025
	SUPERSEDES	NIL

1. Purpose

The purpose of this Whistleblower Policy is to encourage and protect employees, directors, officers, and other stakeholders who report unethical, illegal, or fraudulent activities within Raviraj Foils Ltd. This policy ensures that such individuals can raise concerns without fear of retaliation, promoting a culture of transparency, integrity, and accountability in alignment with the Global Reporting Initiative (GRI) standards.

2. Scope

This policy applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders associated with Raviraj Foils Ltd. It covers the reporting of any suspected violations, including but not limited to fraud, corruption, harassment, discrimination, environmental damage, and non-compliance with laws or company policies.

3. Core Principles

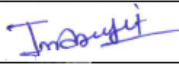
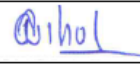
Confidentiality: All whistleblower reports will be treated with the utmost confidentiality to protect the identity of the whistleblower.

No Retaliation: Raviraj Foils Ltd. strictly prohibits retaliation against anyone who reports a concern in good faith. Retaliation may include dismissal, demotion, harassment, or any other adverse action.

Impartial Investigation: All reported concerns will be investigated thoroughly and impartially, with appropriate actions taken based on the findings.

4. Quantified Objectives

Objective 1: Ensure 100% of employees, directors, and officers are aware of the Whistleblower Policy and reporting mechanisms annually.

PREPARED BY:	CHECKED BY:	APPROVED BY:
		
Safety Officer	Sr. EHS Officer	HR - Head
DATE: 20/08/2024	DATE: 20/8/2024	DATE: 20/08/2024

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Objective 2: Maintain a zero-tolerance stance on retaliation, ensuring zero incidents of retaliation against whistleblowers annually.

Objective 3: Investigate 100% of whistleblower reports within a 30-day period from the date of receipt.

Objective 4: Conduct at least one awareness campaign per year to promote the Whistleblower Policy and encourage reporting of concerns.

5. Reporting Mechanisms

Anonymous Reporting: Whistleblowers may report their concerns anonymously through the company's whistleblowing hotline, email, or secure dropbox.

Direct Reporting: Concerns can also be reported directly to the Compliance Officer, Legal Head, or any member of the Whistleblower Committee.

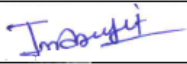
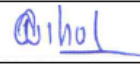
External Reporting: If internal reporting mechanisms are not appropriate or effective, whistleblowers may report concerns to external authorities as permitted by law.

6. Examples of Reportable Concerns

Financial Misconduct: Fraud, embezzlement, accounting irregularities, or any other form of financial mismanagement.

Corruption and Bribery: Offering, giving, receiving, or soliciting bribes or other improper payments.

Harassment and Discrimination: Any form of workplace harassment, bullying, or discrimination based on race, gender, age, religion, disability, or other protected characteristics.

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Environmental Violations: Non-compliance with environmental laws, regulations, or company policies that could lead to environmental harm.

Safety Violations: Breaches of health and safety regulations that put employees, customers, or the public at risk.

Ethical Violations: Any other behavior that violates the company's Code of Conduct, including conflicts of interest and abuse of power.

7. Investigation Process

Acknowledgment of Report: The whistleblower will receive an acknowledgment of their report within 5 business days, if contact information is provided.

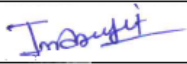
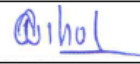
Initial Assessment: The Compliance Officer or designated investigator will conduct an initial assessment to determine the validity of the report and the appropriate course of action.

Formal Investigation: If warranted, a formal investigation will be initiated. This may involve interviews, document reviews, and collaboration with internal or external experts.

Outcome and Actions: Upon conclusion of the investigation, the findings will be documented, and appropriate actions will be taken. The whistleblower will be informed of the outcome, subject to confidentiality constraints.

8. Protection Against Retaliation

Monitoring: The company will monitor the work environment to ensure that no retaliatory actions are taken against whistleblowers. Any employee found to have engaged in retaliation will be subject to disciplinary action, including termination of employment.

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Support: Whistleblowers will be provided with support and counseling services as needed to ensure their well-being during and after the investigation process.

9. Training and Awareness

Mandatory Training: All employees, directors, and officers must undergo training on the Whistleblower Policy and procedures annually. This training will cover the importance of reporting concerns, how to make a report, and protections available to whistleblowers.

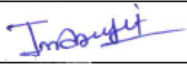
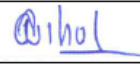
Ongoing Communication: The company will conduct regular awareness campaigns to ensure that all stakeholders are aware of the Whistleblower Policy and encouraged to report any concerns without fear of retaliation.

10. Review and Revision

Regular Review: This Whistleblower Policy will be reviewed annually or as needed to ensure it remains effective and aligned with best practices and legal requirements.

Revision History: Any changes or updates to this policy will be documented in the revision history, and all stakeholders will be informed of the changes.

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

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