PAPADMALJI AGRO FOODS LIMITED

WHISTLE BLOWER POLICY/VIGIL MECHANISM OF THE COMPANY

Version	Summary of Changes	Board Approval	Date of Release
Version 1	Initial	19.10.2025	19.10.2025

Our Whistle Blower Policy encourages disclosure in good faith of any wrongful conduct on a matter of general concern and protects the whistle blower from any adverse personnel action.

1. PREFACE AND OBJECTIVES: -

"Papadmalji Agro Foods Limited" ("Company") follows highest standards of business ethics and management practices in the conduct of its business. Forming a Whistle blower policy is to encourage the employees and directors of the corporation to come forward and express their suspected misconduct concerns without fear of punishment or unfair treatment.

i. The "Whistle Blower Policy"/ "Vigil Mechanism" is formulated for securing/reporting/deterring/punishing/rectifying any unethical, unlawful acts, behavior etc. and to enable to voice/address bonafide concern of malpractice, deviation from the policies of the Company internally in an effective and systematic manner after its discovery.

ii. The employees of the Company have a basic responsibility to make the management aware of any non-adherence of the mechanism.

iii. This mechanism is in accordance with the requirements of Regulation 22 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") and Section 177 of the Companies Act, 2013 and the rules made there under. Any future amendments to the said Act/rules will necessitate amendments of this policy to be in tandem with the prevailing statute.

2. SCOPE OF THE POLICY

The policy covers malpractices and events which have taken place/suspected to have taken place, is being taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company's rules and policies, manipulations, negligence causing danger to public health and safety, misappropriation of monies, and other matters or activity on account of which the interest of the Company is affected and to report the same in accordance with the policy.

3. DEFINITIONS

The definitions of some of the key terms used in the policy are given below.

Capitalized terms not defined herein shall have the meaning assigned to them under the Code.

"Audit Committee "means the Audit Committee of Directors constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013 and read with Regulation 18 of the Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015.

"Employees" means every employee of the Company including the directors in the employment of the Company.

"Code" means the code of "Papadmalji Agro Foods Limited".

"Director" means every Director of the Company, past or present".

"Designated officer" means Chairman of the Audit Committee or such other officer of the Company who shall be expressly designated for the purpose of this mechanism.

"Disciplinary Action" means warning, imposition of fine, suspension from official duties or such other action that may be decided by the Audit Committee depending on the gravity of the matter.

"Disclosure" means reporting of malpractice done by an Individual under and as per the mechanism.

"**Individual"** means the person who makes disclosure under this mechanism.

"**Wrongdoer"** means person against whom disclosure of malpractice is made by an Individual.

"**Whistle Blower**" Any Employee or Director who discloses or demonstrates evidence of an unethical activity or any conduct that may constitute breach of the Company's Code of Conduct or Values.

ELIGIBILITY

Employees of the Company are eligible to make Protected Disclosures under the Policy in relation to matters relating to alleged wrongful conduct.

4. APPLICABILITY

This mechanism shall, in relation to the Company, apply to all the:

i. Directors,
ii. Employees,
iii. Trainees,
iv. Any other persons as may be decided by the Board of Directors of the Company.

5. COVERAGE

The following activities, events may be brought to the notice of the designated officer:

i. Violation of Code of Conduct of the Company.
ii. Unethical, immoral, biased conduct or behavior.
iii. Abuse of the power or the authority given.
iv. Breach of contract.
v. Tampering or manipulating any record and data of the Company.
vi. Any activity, malpractice or wrongdoing which may be harmful for the persons working in or for the Company or for the Company's image.
vii. Financial irregularities and any type of fraud.
viii. Misappropriation of the Company's funds.
ix. Any activity which is criminal and illegal in nature.
x. Negligence, lapse causing harm to environment or health, safety of the employees of the Company or public.
xi. Concealment of above activities.
xii. Such other issues as may be prescribed by the Audit Committee.

6. PROCEDURE TO BE FOLLOWED UNDER THIS MECHANISM

1) Disclosure:

Any person may disclose, preferably in writing the following:

I. Brief details of the malpractice found or discovered,
II. Name of the alleged wrongdoer,
III. Evidence, if any, to support the allegation,
IV. Remedial actions required to be taken,
V. Any other relevant details.

The disclosure may be made within 30 days of being aware of the event to the designated officer of the Company. The time limit of 30 days may be extended at the discretion of the designated officer, after considering the circumstances. The person making the said disclosure may disclose his / her identity to the designated officer. The identity of the person reporting the malpractice will be kept confidential if the same is provided with a condition to keep it anonymous.

Note: In exceptional cases, the person making the disclosure can have direct access to the Chairperson of the Audit Committee of the Company.

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