Rama Petrochemicals Limited
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Name of document	**Vigil Mechanism/Whistle Blower Policy**
Applicability	**Rama Petrochemicals Limited**
Effective date	**May 27, 2025**

1. Purpose

1.1. Rama Petrochemicals Limited is committed to foster an environment of honest and open communication and discussion, consistent with our values.

1.2. This policy lays down the process to convey Concerns (as stated in Section 4) in good faith to the management and seek resolution towards the same without fear of Whistle-Blower retaliation.

1.3. This policy ensures that any violations, wrongdoing or non-compliances are addressed appropriately and promptly.

2. Governance

2.1. Any changes to this policy shall be implemented only after prior approval of the Chief Compliance Officer and the Audit Committee.

2.2. Chief Compliance Officer shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time.

2.3. Audit Committee shall monitor the effectiveness and review the implementation of the principles set forth in this policy, regularly considering its suitability, adequacy and effectiveness.

3. Applicability

This policy applies to all Associates, Board Members, contractors, consultants, trainees, service providers of the Company and the subsidiaries, affiliates, group companies and persons or entities contractually obligated where ever they may be located.

4. Scope

4.1. This policy covers reporting of any violation, wrongdoing or non-compliance, including without limitation, those relating to the Code of Conduct, policies and standard procedures of Rama Petrochemicals Limited.

4.2. This policy does not cover the following indicative but not exhaustive aspects:

- Compensation related issues like quantum of increments, bonus payouts, etc.
- Queries relating to deduction of tax from salary, etc.
- Inappropriate administration services e.g. quality of food, malfunctioning of phones, etc.
- Malfunctioning of information technology assets like laptop, printers, etc.
- Queries relating to job openings, internal transfers, etc.
- Recommendations to enhance operational efficiencies and/or strategy related decisions.

5. Policy Framework

5.1. Whistle-Blower Policy is the first and often the best way to provide a platform to address any Concern. It is important that our Associates speak up promptly regarding the Concern, so that it can be addressed in a timely manner. The Company will strive to maintain confidentiality to the greatest extent possible and discussion of the concern should be limited to only those individuals with a "need to know."

5.2. Associates with management responsibilities play an important role in the implementation of the principles set forth in this policy. It is the responsibility of these leaders to :

- Make Associates aware of the principles set forth in this policy and the Company's commitment to it;
- Create an environment in which all Associates can, without fear of retaliation, raise what they believe to be honest issues to any level of leadership;
- Report all the Concerns to the Audit Committee promptly.

5.3. No party, including the subject(s) of a Whistle-Blower investigation, may interfere with the investigation. Any attempts to withhold, destroy, damage or tamper with evidence, or attempts to influence/coerce/threaten/entice a party participating in the investigation process, shall warrant a disciplinary action that may even include termination of employment of an Associate or termination of association with a party. Furthermore, the Company shall ensure that any employee assisting in the said investigation is protected to the same extent as a Whistle-Blower.

5.4. All parties must cooperate with the investigation process, without compromising their self- incrimination privileges under applicable laws. Furthermore, investigations must be treated as a fact- finding discovery procedure and not as an accusation in itself. It is possible that the outcome of the investigation may conclude that an act in violation of the Code of Conduct or any Policies was not committed.

6. Reporting Channels

The Associates can convey their Concerns through either of the following channels:

- Email
- Written complaint.

7. Dealing with the reported Concerns

7.1. If Whistle-Blower chooses to express his / her Concern, he / she may disclose his / her identity. The Whistle-Blower must disclose:

- Associates or group of Associates against whom he / she has a concern; and
- Nature of Concern

7.2. The Audit Committee shall assess the basis and merit of the Concern. An investigation shall be launched only if the concern(s) raised entails unethical or improper conduct in violation of the Code of Conduct or any of the Policies and procedures. The Audit Committee may also on board a third party investigator[1] at their discretion to help with the proceedings, if needed. The Audit Committee shall ensure that all members of the investigation team are independent and shall act without prejudice or bias[2]. The investigating team shall conduct its task in a thorough, fair, objective, legally compliant manner and uphold highest professional and moral standards.

7.3. If the reported concern is against any member of the Audit Committee, the concerned member shall recuse himself / herself immediately from any further investigation until the actions are completed on that concern by remaining Audit Committee Members.
7.4. Audit Committee Member(s) meet at regular intervals to discuss and assess the nature and gravity of Concern(s) and document the minutes of such discussions for future reference.
7.5. Whistle-Blower should co-operate during investigation and thereafter, whenever called-upon by Committee. Audit Committee shall ensure that such interactions are at a minimum to avoid harassment.
7.6. Audit Committee Members should make best efforts to complete investigation at the earliest after receipt of Concern and prepare a report including but not limited to the following:
- Original Concern statement of Whistle-Blower
- Maintain records of investigation with concerned stakeholders
- Investigation outcome, recommended action, responsible persons and timelines

7.7. Audit Committee may communicate the results of investigation to the Whistle-Blower after completion of Investigation. Audit Committee may keep Whistle-Blower informed about the development(s) of the Investigation.
7.8. Audit Committee should also ensure that recommended actions are implemented.
7.9. Respective Business Heads, depending on the nature of Concern(s) or complaint(s) should extend their co-operation to Audit Committee whenever required.
7.10. Audit Committee shall maintain complete confidentiality of Whistle-Blower and protect him / her from retaliation during investigation and thereafter.

8. Whistle-Blower Retaliation

8.1. Whistle-Blower retaliation is action in response to a protected disclosure of information and includes actions that could adversely affect the Whistle-Blower.
8.2. Retaliation against any Whistle-Blower who raises a concern or reports misconduct is strictly prohibited. In case of any retaliation against raising a concern in good faith, the Whistle Blower should contact the Audit Committee immediately.
8.3. If any individual, regardless of his or her role in the Company , retaliates against a Whistle-Blower, the Company will take appropriate action – even if it later turns out that the Whistle-Blower was mistaken in reporting the matter.

9. False Reporting

If at any time, it is revealed that the concern was raised with mala-fide intent, then the person reporting it will be subjected to disciplinary action, that may even include termination of employment of an Associate or termination of association with a party.

10. Record Retention

Documents received/generated during reporting, investigation and enforcement pursuant to this policy, shall be retained as per Company's data retention policy and applicable laws or regulations.

11. Exception(s)

All exceptions to this policy must be approved by Audit Committee.

12. Interpretation

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

13. Amendments:

The policy is a public document and shall be uploaded on the website of the Company. The Board shall have the power to amend the policy or replace the policy entirely with a new policy. However, the Managing Director/Whole Time Director and the Company Secretary are jointly authorized to provide clarifications or to amend the Policy to give effect to any changes / amendments notified by the Securities Exchange Board of India. Consequently, the policy shall be placed before the Board for their noting and ratification.

For RAMA PETROCHEMICALS LIMITED

HARESH D. RAMSINGHANI
MANAGING DIRECTOR
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