



**Whistle Blower Policy: Guidelines for Rx Propellant
Private Limited, 2025**

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WHISTLE BLOWER POLICY

1. INTRODUCTION

This whistle-blower policy (“**Policy**”) applies to the employees (including any ex-employee), officers, consultants, contractors, volunteers, interns, casual workers, and agency workers and operations of Rx Propellant Private Limited and its Group Entities (*defined below*) (“**Company**”).

For the purpose of this Policy, “**Group Entities**” shall mean and include all subsidiaries, affiliates, associates, and any other entities in which Rx Propellant Private Limited holds or may hold a controlling interest, whether directly or indirectly. This includes, but is not limited to, GV Discovery Centers Private Limited, and Crescentia Labs Private Limited, and such other companies as may be established, incorporated, acquired or otherwise may become subject to controlling interest by Rx Propellant Private Limited whether directly or indirectly.

2. ABOUT THIS POLICY

The Company is committed to conducting its business in a fair and transparent manner and we expect all staff to maintain highest standards of professionalism, honesty, integrity, and ethical behavior. Any suspected wrongdoing should be reported as soon as possible.

3. WHAT IS WHISTLE BLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the Company’s activities/day-to-day business. This includes bribery, fraud, malpractices or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

4. PURPOSE AND COVERAGE

The Company encourages all its employees, business associates and third parties to report in good faith, if they are suspicious of any illegal, unethical, or inappropriate activity (hereinafter referred to as “**Breach**”). This includes malpractices and events that have taken place/are suspected to have taken place, involving (but not limited to) the following:

- 4.1. Breach of Company policies and guidelines.
- 4.2. Willful omission to perform the duty.
- 4.3. Financial statement disclosures.
- 4.4. Financial irregularities, including fraud or suspected fraud.
- 4.5. Questionable internal accounting controls and auditing.
- 4.6. Misappropriation of Company funds/assets (e.g. forged bills, personal use of Company assets etc.).
- 4.7. Violation of any laws/regulations.
- 4.8. Dual employment directly or indirectly affects the interest of the Company.
- 4.9. Manipulation of Company’s data/records.
- 4.10. Breach of contract.
- 4.11. Negligence causes substantial and specific dangers to public health and safety.
- 4.12. Indulgence in any unlawful act involving violation of any criminal/civil law/legislations.
- 4.13. Pilferage of confidential/propriety information.

- 4.14. Any other unethical, biased, favored, imprudent event.
- 4.15. Kickbacks (a kickback is the payment to a recipient as compensation or reward for providing favorable treatment or services to another party) or participation in corrupt activities.
- 4.16. Misusing/taking advantages of functional procedural lapse including misrepresentation of the facts or falsification of records of the Company.
- 4.17. Abuse of power or authority for any unauthorized or ulterior purpose.
- 4.18. Unauthorized communication of any unpublished price sensitive information about the Company and/or its clients.
- 4.19. Dangerous practice(s) are likely to cause physical harm/damage to any person/property.
- 4.20. Unfair discrimination, coercion, harassment in the course of employment or provision of services.
- 4.21. Abuse of power or authority for any unauthorized or ulterior purpose.
- 4.22. Misuse of money belonging to the customers in any form (e.g. taking unauthorized money /gifts or offer of entertainment from customers etc.).
- 4.23. Any undue favour to the customers for personal gains (e.g. forging documents, deliberately hiding important facts etc.).

Such reporting is commonly known as “**Whistleblowing**”. The Company conducts business based on the principles of integrity, honesty, respect, and ethical behavior. Accordingly, it wants to ensure that any employee or business associate who wishes to report a Breach (hereinunder referred to as a “**Whistle Blower**”), which he or she reasonably believes to be true, without the risk of retaliation, with the assurance that all such reported Breach will be treated as confidential and promptly investigated.

5. GUIDING PRINCIPLES

The guiding principles to ensure that this Policy is adhered to are as follows:

- 5.1. The disclosures made by the Whistle Blower should be acted on in a time bound manner.
- 5.2. Complete confidentiality of the Whistle Blower is maintained.
- 5.3. Protection/no retaliation (including protection from unfair treatment and victimization of the Whistle Blower).
- 5.4. Evidence of the malpractice disclosed is not concealed and appropriate action including disciplinary action is taken in case of attempts to conceal or destroy evidence.
- 5.5. Good faith.
- 5.6. Transparency/fair process (including opportunity of being heard is given to the employee against whom it has been alleged to have carried out the Breach).

Violation of these guiding principles shall be seen as a serious offence that may warrant strict disciplinary action.

6. RAISE A CONCERN

We hope that in many cases you will be able to raise any concerns with your reporting manager (in writing). However, where you prefer not to raise it with your manager for any reason, you should write to whistleblower@rxpropellant.com

The Company will arrange a meeting with the Whistle Blower as soon as possible to discuss his/her concern. The Whistle Blower may bring a colleague to any such meeting(s) under this Policy; however the said colleague must respect the confidentiality of the disclosure to be made by the Whistle Blower and any subsequent investigation.

7. CONFIDENTIALITY

The Company anticipates that the staff will be able to voice Whistleblowing concerns openly under this Policy. Completely anonymous disclosures are difficult to investigate. In case Whistle Blower wants to raise a concern confidentially, the Company will make every effort to keep the Whistle Blower's identity secret and only reveal it where necessary to those involved in the investigation.

8. EXTERNAL DISCLOSURES

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing at the workplace. In most cases the Whistle Blower should not find it necessary to alert anyone externally.

The law recognizes that in some circumstances it may be appropriate for the Whistle Blower to report his/her concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone externally. Public concern at work operates a confidential helpline. Their contact details are at the end of this Policy. The Whistle Blower must not resort to any form of external or internal publicity.

9. ROLES AND RESPONSIBILITIES OF A WHISTLE BLOWER

- 9.1 The Whistle Blower's role is that of a reporting party with reliable information.
- 9.2 The Whistle Blower must provide all factual evidence, as is available/possible, to enable the commencement of an investigation. An investigation will not be undertaken without verifiable support. However, the Whistle Blower shall refrain from obtaining evidence for which they do not have the right of access.
- 9.3 The Whistle Blower is not required or expected to conduct any investigations on his/her own or otherwise act as an investigator or a finder of facts.
- 9.4 The Whistle Blower to ensure that any information/evidence does not contain any baseless allegations or speculative matters.
- 9.5 Whistle Blowers should not misuse this Policy as a defense or a mechanism to mislead the Company against a legitimate action initiated.

- 9.6 The Whistle Blower should be prepared to be interviewed by the CEO¹ and is allowed to be candid at the interview. The Whistle Blower is precluded from conducting his/her own investigation.
- 9.7 This Policy is not to be used for reporting any routine/ administrative matters.
- 9.8 The Whistle Blower shall have a right to be informed of the disposition of his/her disclosure except for overriding legal or other reasons on his/her written request.
- 9.9 Disclosures made in relation to any identified malpractices will be appropriately dealt with by the committee (**Whistleblowing Committee**).

10. DISQUALIFICATION

- 10.1 While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment and victimization, as herein set out, any abuse of this protection may warrant suitable action against the Whistle Blower. Incidents of retaliation against the Whistle Blower or person investigating the matter or assisting in the investigation would be taken seriously by the Company and will result in appropriate disciplinary action against the person who committed the act of retaliation.
- 10.2 Whistle Blowers, who make disclosures, which have been subsequently found to be motivated or malafide or malicious or frivolous, baseless, or reported otherwise than in good faith, will be liable for disciplinary action under the provision of applicable conduct, discipline and appeal related rules/policies of the Company and/or the applicable standing orders, as the case may be (“**Service Rules**”) of the Company.

11. INVESTIGATION PARTICIPANT

- 11.1 All persons who are interviewed, asked to provide information, or otherwise participate in an investigation (hereinafter referred to as “**Participant**”) have a duty to fully cooperate with the investigators.
- 11.2 Participants should refrain from discussing or disclosing the investigation or their testimony with anyone not connected to the investigation. Under no circumstance should the Participant discuss with the Subject (defined herein-below), the nature of the evidence requested or provided, or the testimony given to investigators, unless agreed to by the investigators.
- 11.3 Requests for confidentiality or anonymity by Participant(s) will be honoured to the extent possible, within the legitimate needs of law and the investigation.
- 11.4 Participants are entitled to protection from retaliation for having participated in an investigation.

¹ “**CEO**” shall mean any person formally appointed as the Chief Executive Officer of the Company. Until the formal appointment of CEO, any individual from ACTIS who performs the functions of the CEO shall be deemed to be the CEO of the Company.

12. INVESTIGATION OF THE SUBJECT

- 12.1 The identity of the person against whom the Breach has been alleged (**Subject**) should be maintained in confidence to the extent possible, given the legitimate needs of law and fairness in investigation.
- 12.2 The decision to conduct an investigation is not an accusation; it is to be treated as a neutral fact- finding process.
- 12.3 Subjects should be informed of the whistleblowing complaint and should be provided with opportunities to be heard during the investigation.
- 12.4 Subjects have a responsibility not to interfere with the investigation and to adhere to warnings from investigators in this regard. Evidence shall not be withheld, destroyed, or tampered with, and witnesses shall not be influenced, coached, or intimidated.
- 12.5 Unless there are compelling reasons to the contrary, the Subjects should be given the opportunity to respond to material points of evidence contained in an investigation report.
- 12.6 Subjects have the right to be informed of the outcome of the investigation.
- 12.7 Suitable disciplinary action shall be initiated against the Subject if found guilty, as a result of an investigation pursuant to this Policy.

13. WHISTLEBLOWING COMMITTEE & ITS RESPONSIBILITIES

- 13.1 The following shall be the constitution of the Whistle Blowing Committee:

S. No	Member	Designation	Email ID
1.	Praveen Kumar	Committee Chairman	PraveenKumar@act.is
2.	Sandhya Sama	Member	sandhya.sama@rxpropellant.com
3.	Ravindra Singh Verma	Member	ravindra.verma@rxpropellant.com
4.	Phani Rama Krishna Dulam	Member	phani.ramakrishna@rxpropellant.com

- 13.2 The Whistle Blowing Committee shall be responsible for:
 - a) Will be responsible for ensuring that the investigation process is fair and transparent.
 - b) Will provide sufficient and fair opportunity to the aggrieved person to prove/justify his/her stand and case, including a personal hearing, as may be required, and shall ensure complete fairness in the process of investigation.
 - c) Upon receiving an investigation report, the Whistleblowing Committee will determine the appropriate disciplinary and/or legal action to be taken against the accused and the supervisors whose failures have contributed to the commission of fraud and will ensure that appropriate action is taken to recover losses.

- d) Will take appropriate measures in case of frivolous or bad faith allegations.
- e) Will take appropriate measures if a staff member is cleared of allegations made in good faith.

14. WHISTLEBLOWER PROTECTION

The Company will do its best to protect the Whistle Blower against retaliation, as described below:

- 14.1 The Company will keep the Whistle Blower's identity confidential, unless:
 - a) The person agrees to be identified.
 - b) Identification is necessary to allow the Company or law enforcement officials to investigate or respond effectively to a complaint.
 - c) Identification is required by law.
 - d) The person accused of compliance violation is entitled to the information as a matter of legal right.
- 14.2 No unfair treatment will be meted out to Whistle Blower by virtue of his/her having reported a Breach under this Policy.
- 14.3 The Company prohibits retaliation, threat, or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion against a Whistle Blower with the intent or effect of adversely affecting the terms or conditions of the Whistle Blower's employment (including, but not limited to, threats of physical harm, loss of job or impact on salary or wages).
- 14.4 If the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, arrangements will be made for the Whistle Blower to receive advice about the procedure. Expenses incurred by the Whistle Blower in connection with the above, towards travel etc., will be reimbursed as per normal entitlements.
- 14.5 A Whistle Blower may report any violation of the above clause to the director and/or the CEO¹ of the Company or to any person(s) to whom he/she may delegate any of his/her powers from time to time, who shall investigate into the same and take corrective action as may be required.
- 14.6 In the event that a complaint made in good faith is subsequently found to be untrue, no action would be initiated against the Whistle Blower. However, Whistle Blower must be cautious to avoid baseless allegations.
- 14.7 Any other employee/Participant assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

¹ "CEO" shall mean any person formally appointed as the Chief Executive Officer of the Company. Until the formal appointment of CEO, any individual from ACTIS who performs the functions of the CEO shall be deemed to be the CEO of the Company.

15. PROCEDURE & INVESTIGATION

- 15.1 All disclosures of Breach should be made in writing and sent through appropriate channels as identified in this Policy. Any disclosure of Breach is required to contain adequate details on the events to which the disclosure pertains. To the extent possible, the said disclosure should contain specific and reliable information and proper evidence to allow for proper assessment of nature and extent of the concern. An investigation of unspecified wrongdoing or broad allegations would not be undertaken.
- 15.2 The disclosures of Breach should be attached to a letter bearing the identity of the Whistle Blower/complainant i.e. his/her name, employee number, contact number and location, and should be submitted in a **closed / secured / sealed envelope** addressed to the Whistleblowing Committee which should be **super scribed 'protected disclosure'**. (If the envelope is not super scribed and closed / sealed / secured, it will not be possible to provide protection to the Whistle Blower as specified under this Policy).
- 15.3 If the Whistle Blower believes that there is a conflict of interest between the any member of the Whistleblowing Committee and the Whistle Blower, he/she may send his/her disclosure of Breach directly to the chairperson/head of the Whistleblowing Committee. Further, if the Whistle Blower has reasons to believe that his/her disclosure of Breach may contain information likely to impact the chairperson/head of the Whistleblowing Committee and result in a possible conflict of interest, he/she may send his/her disclosure of Breach to the remaining members of the Whistleblowing Committee and shall be dealt with, by them in such manner as they may deem appropriate.
- 15.4 Anonymous or pseudonymous disclosure shall not be entertained.
- 15.5 Disclosures should either be typed or written in legible handwriting in English, Hindi, or regional language of the place of employment of the Whistle Blower and should provide a clear understanding of the Breach involved, or issue/concern raised.
- 15.6 Disclosures should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and should keep in investigation.
- 15.7 Investigations will be launched only after a preliminary review which establishes that:
- a) The alleged act constitutes a Breach or unethical conduct; and
 - b) The allegation is supported by information specific enough to be investigated or in cases where the allegation is not supported by specific information, but it is felt that the concerned matter deserves investigation.
- 15.8 The Whistleblowing Committee will, depending on the details of the Breach received, outline the detailed procedure and scope for the conduct of such investigation.
- 15.9 If the Whistleblowing Committee determines that an investigation is not warranted, reason(s) for such determination shall be recorded in writing.

- 15.10 The decision to conduct an investigation taken by the Whistleblowing Committee itself is not to be construed as an accusation and is to be treated as a neutral fact-finding process.
- 15.11 The identity of a Subject and the Whistle Blower will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- 15.12 Subjects will normally be informed of the allegations at the onset of a formal investigation and will be given opportunities for providing their input during the investigation.
- 15.13 Subjects shall have a duty to co-operate with the Whistleblowing Committee during investigation to the extent that such co-operation will not compromise self-incrimination protections available under the applicable laws.
- 15.14 Subjects have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed, or tampered with, and witnesses shall not be influenced, coached, threatened, or intimidated by the Subjects.
- 15.15 Unless there are compelling reasons not to do so, Subjects will be given the opportunity of being heard, respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.
- 15.16 Subjects have a right to be informed of the outcome of the investigation.
- 15.17 The investigation shall be completed normally within [45] days of the date of receipt of the disclosure or such extended period as the Whistleblowing Committee may permit for reasons to be recorded.
- 15.18 The Whistleblowing Committee shall have the right to call for information/document and/or examination of any employee (including the Subject and Whistle Blower) as they may deem necessary to the process of investigation.

16. ACTION

- 16.1 If an investigation discloses the existence of any illegal/unethical activity, the Whistleblowing Committee and/or the Company, as the case may be, shall be entitled to take or may direct the concerned authority to take disciplinary action under the provision of applicable Service Rules and/or initiate action under applicable statutory provisions.
- 16.2 Upon satisfaction that the disclosure is false, motivated, or vexatious, the Whistleblowing Committee and/or any officer thereof may report the matter to the concerned disciplinary authority for appropriate disciplinary action against the Whistleblower in line with the Service Rules of the Company.
- 16.3 Other remedial action as deemed fit, shall be taken to remedy the fraud/malpractices as mentioned in the disclosures or to prevent the re-occurrence of such illegal/unethical practices.
- 16.4 If the Whistleblowing Committee is of the opinion that the investigation discloses that no further action on the disclosure made is warranted, they shall record in writing.

- 16.5 The Whistle Blower shall not determine the appropriate corrective or remedial action that may be warranted. In case a Whistle Blower is not satisfied with the action taken on the disclosure of potential Breach submitted, then he/she may write to the Whistleblowing Committee with details of his/her disclosure and reason for dissatisfaction. The Whistleblowing Committee will take appropriate steps after consultation with the other members of the said Committee. The decision of the Whistleblowing Committee shall be final for such cases.
- 16.6 All parties, including Whistleblower and the Subject shall (a) maintain confidentiality of all matters that form part of the disclosure; (b) discuss matters relating to the disclosures only to the extent required or with those persons as required for the completion of the process of investigation.

17. RETENTION OF DOCUMENTS

All disclosures made in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of [five] years or any other period, specified by any other law for the time being in force. All necessary steps shall be taken by all parties and the Company to obtain and preserve relevant emails, business communications, financial documents, or other evidence that is relevant to the scope of their investigation. Such information shall be preserved in line with the existing policies of the Company.

18. COMMUNICATION/AMENDMENTS/MODIFICATIONS

The Policy cannot be effective unless it is properly communicated to employees. Therefore, this Policy shall be published on the internal and external website of the Company. The Company reserves its right to amend or modify this Policy in whole or in part, at any time with the approval of management. However, no such amendment or modification will be binding on the employees unless the same is notified to the employees.

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood, and will abide by this Policy. This Policy shall form part of the employee handbook and internal policies of the Company.

19. DISSEMINATION OF THE POLICY

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood, and will abide by this Policy. This Policy shall form part of the employee handbook and internal policies of the Company.

20. POLICY APPROVAL AND AMENDMENT

Effective Date	Version	Approved by the Board of Directors	Comments
22.01.2024	1.0	Yes	In the Board Meeting held on 22.01.2024
24.11.2025	2.0	Yes	In the Board Meeting held on 24.11.2025

ACKNOWLEDGEMENT AND AGREEMENT

I have received a copy of the Whistle Blower Policy as adopted by the Company on _____. I hereby acknowledge and understand the terms of the Policy. I confirm that from _____ ('Employee Joining Date') my conduct has been in compliance with the terms of the Policy and will continue to be so in the future.

Employee Name:

Employee Signature Date: