



# Mentha & Allied Products Private Limited

A WHO/GMP & ISO 9001 : 2015 CERTIFIED COMPANY  
CIN : U74899DL1983PTC016079

India's Oldest/Largest Producers and Exporters of :  
MENTHA OIL-MENTHOL-PEPPERMINT OIL-PINE CHEMICALS-ORANGE OIL

Works 1 : 16th Kilometer Rampur-Swar Road, Rampur-244 901 (U.P.) India  
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## WHISTLE BLOWER POLICY

### 1. PREFACE

**MENTHA AND ALLIED PRODUCTS PRIVATE LIMITED** is committed towards fair, transparent and ethically correct way of working. Any deviation from the internal systematic operating procedures, Code of Conduct or any act which in general or in any way violates the ideology of the company should always be brought into the notice of the management of the company.

To streamline the process of reporting, this Whistle Blowing Policy has been conceived. This Whistle Blowing Policy also explains the rights and protection provided to the Whistle Blowers by the company.

### 2. PURPOSE

At **MENTHA AND ALLIED PRODUCTS PRIVATE LIMITED**, we promote zero tolerance to unethical conduct at all levels of the company. The Company is committed to comply with the highest standards of professionalism, honesty, integrity and ethical behavior, in line with the Company's Code of Conduct and Ethics.

This policy aims to provide a secure environment and to encourage employees of the Company to report unethical, unlawful or improper practices, acts or activities in the Company and to prohibit managerial personnel from taking any adverse personnel action against those employees who report such practices in good faith.

### 3. APPLICABILITY:

The whistle blower policy is applicable to all the Board Members and to all other permanent employees of the Company.

#### **4. SCOPE**

The Whistle Blower Policy enumerates following conducts as unethical and wrongful and will be treated as per the provisions of this code:-

- Disclosure of any confidential information or data of the company.
- Unauthorized manipulation of any information or data of the company in any possible manner.
- Unauthorized access or usage of company's Assets or data.
- Wastage of company's resources or Assets.
- Any activity which may negatively affect the image or brands of the company in public.
- Any activity which may adversely affect the Company in any manner whatsoever.

The above-mentioned list is exhaustive. The Board of Director of the Company may at any time deem any another activity or conduct as unethical and inappropriate.

#### **5. PROCEDURE FOR WHISTLE BLOWING**

- Any person to whom the policy is applicable if detects any matter falling within the purview of this policy shall bring it under the notice of the Management.
- Such a person shall be entitled to have direct access to the Management to bring it to their notice.
- Disclosure may be done by way of notice/complain through e-mail, personally or through any other means as deems ok to the person.
- The Company shall ensure that there exist enough means by way of which any Whistle Blower may have access to the Management.

#### **6. CONFIDENTIALITY**

It is the duty of the Management to ensure the confidentiality of the whistle Blower.

To maintain the confidentiality of the person making the complaint or notice shall be referred as 'Whistle Blower' and name of such a person shall not be disclosed at least at any time before the enquiry is complete.

## **7. INVESTIGATION**

- The Management should immediately conduct investigation on receiving any complaint or notice from any Whistle Blower. The Management may also suo motto conduct inquiry in matter where it suspects possible fraud.
- Depending upon the facts of the matter the Management may engage an outside agency where investigation requires professional expertise.
- If, at the conclusion of its investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense.
- The investigation shall be completed normally within 45 days of the receipt of the communication regarding alleged wrongful conduct.
- Management shall submit the Investigation Report to the Board of Directors and shall ensure its secrecy from any other person before submitting it to the Board.

## **8. PUNITIVE ACTIONS**

The Board of Directors on receiving the Investigation Report shall decide on behalf of the company on the recourse to be taken towards the guilty.

Depending upon the nature of the wrong/fraud the Board may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.

## **9. PROTECTION AGAINST RETALIATION**

The Management is bound to provide protection to the Whistle Blower against any kind of retaliation within the company premises. If the circumstances require so, the Management is authorized to take any administrative action on behalf of the company to protect the right of the Whistle Blower.

## **10. FALSE ALLEGATIONS**

At **MENTHA AND ALLIED PRODUCTS PRIVATE LIMITED**, matters pertaining to false allegations are dealt and taken seriously.

If the Investigation Report reveals the complaint as false allegation, the Board may take any disciplinary actions including temporary suspension of employment, as it deems fit against the complainant.

If a false allegation turns out to be a result of conspiracy, the complainant and the other persons acting in connivance, if any in such a case the Board may decide upon terminating their engagement with the company permanently.

## **11. DOCUMENT RETENTION**

**MENTHA AND ALLIED PRODUCTS** has all rights reserved to keep all the evidences, proofs, investigations reports, all ancillary and supporting documents in its own custody. The Board may further authorize any person to keep such documents in safe custody.

## **12. AMENDMENT**

The Board of Directors of **MENTHA AND ALLIED PRODUCTS PRIVATE LIMITED** may review, alter or amend the provisions of the policy at such intervals as they deem fit. The alteration or amendment shall always be in line with the basic theme of this Whistle Blower Policy.

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