

WHISTLEBLOWING POLICY



GENERAL POULTRY COMPANY
B.S.C. (C)

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1. PREAMBLE

The Board is committed to the highest possible standards of openness, probity and accountability.

This policy document explains the modalities of reporting any misconduct to the designated officials.

This policy is formulated to provide opportunity to employees to raise their voice in good faith, in case they observe any unethical and improper practices or any other wrongful conduct in the Company and to ensure protection to whistleblower.

2. AIMS AND SCOPE OF WHISTLEBLOWING POLICY

This policy aims to:

- Encourage the employee to feel confident in raising serious concerns and to question and act upon concerns about practice,
- Provide avenues for employee to raise those concerns and receive feedback on any action taken,
- Ensure that employee receives a response to their concerns and that they become aware of how to pursue them if they are not satisfied,
- Reassure that whistleblower will be protected from possible reprisals or victimization.

The whistle-blowing policy is intended to cover unethical concerns. These include but not limited to:

- Conduct which is an offence or a breach of law,
- Inappropriate accounting practices,
- Health and safety risks, including risks to the public as well as other employees,
- Damage to the environment,
- The unauthorized use of company funds,
- Possible fraud and corruption,
- Sexual or physical abuse,
- Other unethical conduct.

3. HOW TO RAISE A CONCERN

Employee can raise their concern directly to the Audit Committee member or alternatively to any officer identified by audit committee, who will report directly to the Audit Committee on the issue.

Audit Committee shall devise the procedure and mode to raise the concerns which may include but not limited to verbal or written.

Audit Committee may ask for any detail required to ascertain the legitimacy of the concern which may include but not limited to:

- The background and history of the concern (giving relevant dates),
- The reason why you are particularly concerned about the situation.

4. PROTECTION TO THE WHISTLE BLOWER

A. Harassment or Victimization

- The Audit Committee is committed to good practice and high standards and wants to be supportive of employees.
- The Committee recognizes that the decision to report a concern can be a difficult one to make. If the employee is acting in good faith, he/she should have nothing to fear because he will be doing his duty towards employer and those for whom he is providing a service.
- The Committee will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action to protect the employee when he/she raises a concern in good faith.

B. Confidentiality

- All concerns will be treated in confidence and every effort will be made not to reveal the employee identity until he/she wishes so.

C. False allegation & legitimate employment action

- If the employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against him. If, however, he makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him.

5. DEALING WITH REPORTS/COMPLAINTS

Audit Committee shall appropriately and expeditiously investigate all whistleblower reports received.

In this regard, Audit Committee, if the circumstances so suggest, may appoint a senior executive or a committee of managerial personnel to investigate into the matter and prescribe the scope and time limit therefore.

Audit Committee shall have right to outline detailed procedure for an investigation. Where the Audit Committee has designated a senior executive or a committee of managerial personnel for investigation, they shall mandatorily adhere to scope and procedure outlined by Audit Committee for investigation.

The Audit Committee or officer or committee of managerial personnel, as the case may be, shall have right to call for any information/document and examination of any employee of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.

A report shall be prepared after completion of investigation and the Audit Committee shall consider the same.

After considering the report, the Audit Committee shall determine the cause of alleged adverse action and shall recommend for remedies as it deems appropriate.