



Kumar Organic Products Limited
INGREDIENTS FOR US

WHISTLE BLOWER POLICY

CIN: U85110KA1991PLC012095

**Registered Office: Usha Krishna Towers, Plot 36-B, Road No.3 & 5, Jigani
Industrial Area, Anekal Taluk Bangalore -560105, Karnataka. Telephone:**

+91 080 41425832 website : www.kumarorganic.net

KUMAR ORGANIC PRODUCTS LIMITED

WHISTLEBLOWER POLICY

PREFACE & ROLE

- a. The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior.
- b. The company is committed to developing a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct.
- c. Section 177(9) of the Companies Act, 2013 read with Rule 7 of the Companies (Meeting of Board and its Power), Rules 2014, provides a mandatory requirement, for the company to establish a mechanism called "Vigil Mechanism (Whistle Blower Policy)" for employees to report concern about unethical behavior, actual or suspected fraud or violation of the Company's code of conduct.
- d. The Whistleblower should, before making a complaint under this policy, reasonably believe in good faith that there exists sufficient reason or grounds to make such complaints.

YOUR DUTY TO REPORT

Everyone is required to report to the company any suspected violation of any law that applies to the company and any suspected violation of the company's code of conduct and Ethics. It is important that you report all suspected violation. This includes possible accounting or financial reporting violations, insider trading, bribery.

It is the policy of the company that you must, when you reasonably suspect that a violation of an applicable law or the company's Code of Conduct and ethics has occurred or is occurring, report that potential violation. Reporting is crucial for early detection, proper investigation and remediation, and prevention of violations of company policies or applicable laws. You should not fear any negative consequences for reporting reasonable suspected, failure to report any reasonable belief that a violation has occurred or occurring is itself a violation of this policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.

HOW TO REPORT

You must report all suspected violations by sending e-mails to your immediate senior, and whistleblower@kumarorganic.net.

If you have reason to believe that your immediate senior is involved in the suspected violation, you may report to the Audit Committee of Kumar Organic Products Limited, at:

Chairman, Audit Committee
Kumar Organic Products Limited
No.819/C, Usha Krishan Center, 13th Cross,
7th Block (West), JSS College Circle, Jayanagar,
Bangalore - 560 082

Your report should include as much information about the suspected violation as you can provide. Where possible, it should describe the nature of the suspected violation; the identities of persons involved in the suspected violation; a description of documents that relate to the suspected violation; and the time frame during which the suspected violation occurred. You may be contacted for further information.

INVESTIGATIONS AFTER

All reports under this Policy will be promptly and appropriately investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. Everyone working for or with the Company has a duty to co-operate in the investigation of reports of violations. Failure to co-operate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action, including termination of employment. 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. This action 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.

RETALIATION IS NOT TOLERATED

No one may take any adverse action against any employee for complaining about, reporting, or participating or assisting in the investigation of, a reasonably suspected violation of any law, this Policy, or the Company's Code of Conduct and Ethics. The Company takes reports of such retaliation seriously. Incidents of retaliation against any employee reporting a violation or

in appropriate disciplinary action against anyone responsible, including possible termination of employment. Those working for or with the Company who engage in retaliation against reporting employees may also be subject to civil, criminal and administrative penalties.

DOCUMENT RETENTION

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept with the Company and applicable law.



REPORTING

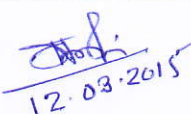
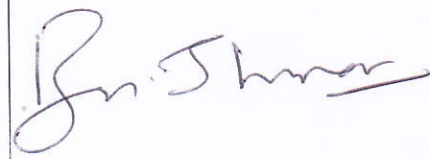

A quarterly report with number of complaints received under the policy and their outcomes shall be placed before the Audit Committee and the Board.

MODIFICATION

The Audit Committee or the Board of Directors of the Company can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with federal, state or local regulations and / or accommodate organizational changes within the Company.

Please sign the acknowledgment form below and return it to Human Resources. This will let the Company know that you have received the Whistleblower Policy and are aware of the Company's commitment to a work environment free of retaliation for reporting violations of any Company policies or any applicable laws.

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| Prepared by Laxmidhar Prusty Company Secretary | Scrutinized by Mr. S R Reddy General Manager-Accounts |
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| Scrutinized by Mr. Sachidanad Singh Director Works | Authorized by Mr. Bharathan Ramakrishnan Director cum CEO | Approved by Mr. Udayan Kumar Singh Managing Director |
|  12.03.2015 |  |  |

**ACKNOWLEDGMENT AND AGREEMENT REGARDING THE WHISTLEBLOWER
POLICY**

This is to acknowledge that I have received a copy of the Company's Whistleblower Policy. I understand that compliance with applicable laws and the Company's Code of Conduct and Ethics is important and, as a public Company, the integrity of the financial information of the Company is paramount. I further understand that the Company is committed to a work environment free of retaliation for employees who have raised concerns regarding violations of this Policy, the Company's Code of Conduct and Ethics or any applicable laws and that the Company specifically prohibits retaliation whenever an employee makes a good faith report regarding such concerns. Accordingly, I specifically agree that to the extent that I reasonably suspect there has been a violation of applicable laws or the Company's Code of Conduct and Ethics, including any retaliation related to the reporting of such concerns, I will immediately report such conduct in accordance with the Company's Whistleblower Policy. I further agree that I will not retaliate against any employee for reporting a reasonably suspected violation in good faith.

I understand and agree that to the extent I do not use the procedures outlined in the Whistleblower Policy, the Company and its officers and directors shall have the right to presume and rely on the fact that I have no knowledge or concern of any such information or conduct.