



Whistleblower Policy

Introduction

At Prism Industries Pvt Ltd, we are committed to maintaining the highest standards of ethical conduct, integrity, and transparency in all our operations. As a global leader in the pharmaceutical industry, manufacturing essential products such as nicotine-based formulations, quinine, hyoscine, lumefantrine, and artemether, we recognize that creating a safe, ethical, and accountable workplace is fundamental to our long-term success. We are determined to operate with honesty and transparency, not only in our business dealings but also within the organization itself.

Our Whistleblower Policy is designed to encourage employees, contractors, and other stakeholders to report unethical, illegal, or harmful practices within the organization without fear of retaliation. We believe that the protection of whistleblowers and their concerns is a critical component in maintaining the trust and integrity of our organization. This policy provides a clear and accessible process for employees to raise concerns about activities or behaviors that might endanger the organization's ethical standards, business integrity, or legal compliance.

Whether dealing with production processes related to nicotine, quinine, hyoscine, lumefantrine, or artemether, we recognize that maintaining high ethical standards in every aspect of our operations is essential to our success. This policy serves as a safeguard for ensuring that all concerns are heard, addressed, and properly investigated in alignment with our core values of integrity, accountability, and transparency.

Scope and Applicability

This policy applies to all employees, contractors, consultants, and business partners at Prism Industries Pvt Ltd, including those involved in the production, distribution, and sale of nicotine, quinine, hyoscine, lumefantrine, and artemether. The policy also applies to third parties, such as suppliers and agents, who are connected with any of our business operations or who are in any way associated with our products and services.

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The Whistleblower Policy applies to any unethical, illegal, or harmful practices related to our activities, including but not limited to:

- **Financial Mismanagement:** Fraud, corruption, or financial malpractice, such as bribery or improper financial reporting.
- **Regulatory Violations:** Non-compliance with legal, regulatory, or pharmaceutical industry standards, particularly in the manufacturing and distribution of nicotine, quinine, hyoscine, lumefantrine, and artemether.
- **Health and Safety Violations:** Failure to comply with workplace safety regulations, unsafe working conditions, or risks to employee health.
- **Environmental Harm:** Violations of environmental laws or harm caused by unsafe production practices, improper waste disposal, or other actions that impact the environment.
- **Discriminatory Practices:** Discrimination based on gender, age, race, sexual orientation, or any other personal characteristic that violates our commitment to diversity and inclusion.
- **Product Quality Concerns:** Any issues relating to the safety, quality, or integrity of our pharmaceutical products, including nicotine-based products or anti-malarial drugs such as quinine and artemether.
- **Harassment:** Any form of harassment, including sexual, racial, or psychological harassment within the workplace.
- **Corruption and Bribery:** Engaging in or being aware of any bribery, kickbacks, or unethical exchange of favors in the course of business.

This policy applies to all concerns raised, regardless of the size or scope of the issue, ensuring that even minor unethical activities are reported and investigated appropriately.

Objectives of the Whistleblower Policy

1. Encourage Ethical Reporting

The primary objective of this policy is to create a culture where employees feel safe and supported in reporting unethical, illegal, or harmful practices within the organization. We aim to foster an environment where raising concerns is encouraged and rewarded, and employees understand the importance of reporting issues in good faith.

2. Protect Employees from Retaliation

One of the most critical goals of the Whistleblower Policy is to protect employees from retaliation when reporting unethical or illegal practices. Prism Industries guarantees that no employee will face retaliation, discrimination, or adverse consequences for raising concerns in good faith, regardless of whether the report leads to a successful investigation or not.

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3. Ensure Transparency and Accountability

We aim to ensure that all concerns are investigated thoroughly, fairly, and promptly. This policy provides a structured, transparent process for addressing issues and holding individuals accountable for their actions. We take all concerns seriously and are committed to resolving issues in a manner that upholds the integrity of the company and complies with all legal and ethical standards.

4. Compliance with Legal Requirements

Prism Industries is committed to complying with all applicable legal requirements concerning whistleblowing. This policy adheres to relevant national and international regulations, including data protection and privacy laws, ensuring that individuals reporting concerns are treated with fairness and their rights protected.

Key Principles of the Whistleblower Policy

1. Confidentiality and Anonymity

Prism Industries respects the confidentiality of whistleblowers. We ensure that reports of unethical behavior are handled confidentially, and every effort will be made to keep the whistleblower's identity anonymous if they wish. Only those who need to know in order to investigate the issue will be informed of the concern.

2. Non-Retaliation Guarantee

Employees, contractors, or other stakeholders who raise concerns will be protected from retaliation. This includes protection from any adverse action, such as dismissal, demotion, harassment, or any other form of discrimination. Any form of retaliation against a whistleblower will itself be treated as a violation of company policy and subject to disciplinary action.

3. Good Faith Reporting

Employees are encouraged to report concerns in good faith. A good faith report means the person genuinely believes the issue is a violation of company policy, legal regulations, or ethical standards. False or malicious claims, made with the intent to harm, will not be tolerated and may lead to disciplinary action.

4. No Tolerance for False Allegations

While we encourage all employees to report concerns, we maintain a zero-tolerance approach toward false or malicious accusations. Any individual who deliberately makes a false claim or report will be subject to the company's disciplinary procedures. However, employees will not be penalized for reporting a concern that they believe to be true, even if the outcome of the investigation is not as expected.



Whistleblowing Process

1. How to Report Concerns

Employees can report concerns through various channels to ensure accessibility and confidentiality:

- **Direct Supervisor or Manager:** If the issue is not with the direct supervisor, employees are encouraged to escalate it to the next level of management or an HR representative.
- **Dedicated Whistleblower Hotline:** A dedicated, anonymous hotline will be available for reporting concerns, providing employees with an alternative reporting mechanism.
- **Email or Secure Online Platform:** Employees can also report concerns via email or through an encrypted online portal designed to ensure anonymity.
- **Third-Party Reporting Service:** Prism Industries may engage third-party services to allow for anonymous reporting and ensure impartiality in handling sensitive concerns.

2. Investigation of Reports

All reports of unethical or illegal behavior will be taken seriously and investigated thoroughly. The investigation process will involve the relevant departments and, if necessary, external experts or legal advisors. The process will be transparent and aim to reach a fair resolution based on the evidence available.

- **Timeliness:** Prism Industries commits to addressing reports promptly, ensuring that investigations are initiated quickly and resolved as efficiently as possible.
- **Objective and Fair Process:** Investigations will be carried out objectively, ensuring that all involved parties are treated fairly, and that appropriate corrective actions are taken where necessary.

3. Feedback and Resolution

While confidentiality and anonymity are paramount, Prism Industries will strive to provide feedback to the whistleblower regarding the outcome of the investigation, unless doing so would compromise confidentiality or the safety of the parties involved. We aim to resolve issues in a manner that is consistent with company policies, industry standards, and legal requirements.

4. Follow-Up Actions

Upon completion of an investigation, the company will take appropriate corrective or disciplinary action based on the findings. This may include corrective measures, such as revising processes, enhancing training, or taking disciplinary actions against individuals responsible for misconduct.

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Roles and Responsibilities

1. **Management**

Management is responsible for fostering an open, transparent environment where employees are encouraged to report concerns. Managers are expected to act as role models, ensuring compliance with this policy and supporting employees who report unethical behavior.

2. **Employees**

Employees are encouraged to report concerns they believe may indicate unethical or illegal behavior. Employees must understand that their actions are vital in maintaining the company's ethical standards.

3. **Whistleblower Coordinator**

The company will designate a Whistleblower Coordinator or a team responsible for overseeing the investigation process and ensuring that all reports are addressed in a timely and appropriate manner.

4. **Compliance Officer**

The Compliance Officer is responsible for ensuring that the Whistleblower Policy is enforced consistently across all levels of the organization. The Compliance Officer will oversee the investigation process, monitor compliance, and ensure that any retaliation is swiftly dealt with.

Conclusion

Prism Industries Pvt Ltd is fully committed to maintaining a culture of integrity, transparency, and accountability. The Whistleblower Policy is a vital part of this commitment, providing employees with the necessary tools and protections to report unethical, illegal, or harmful practices without fear of retaliation. Through this policy, we aim to uphold the highest standards of business conduct and ensure that all concerns are addressed appropriately. By fostering a work environment where employees feel empowered to speak up, we continue to build trust within our organization and with the communities we serve, particularly in the manufacturing and distribution of essential pharmaceutical products such as nicotine, quinine, hyoscine, lumefantrine, and artemether.

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