



## **B.L. Agro Industries Ltd.**

*(Formerly known as B.L. Agro Oils Ltd.)*

H.O./R.O.: B-31, Road No. 2, Parsakhera Industrial Area, Bareilly-243502 (U.P.)

Telephone : 0581-2518300-399; Fax : 0581-2518371

E-mail: enquiry@blagro.org; website: www.blagro.org

CIN: U65910UP1993PLC015039

### **WHISTLE BLOWER POLICY**

#### **Preface**

The Company believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behaviour.

This policy is formulated to provide employees (including labours) and Outsiders like vendors, Purchaser, Bankers an avenue to report to the management any actual or possible illegitimate activity, immoral or irregular act or an event he becomes aware of that could affect the business or reputation of company.

The purpose of this policy is to provide a framework to protect employees wishing to raise a concern about serious irregularities within the Company.

#### **Definitions**

- Company means B.L. Agro Industries Limited
- “Audit Committee” means the Audit Committee of the Board constituted by the Board of Directors of B.L. Agro Industries Limited in accordance with provisions of Section 177 of Companies Act, 2013.
- Whistle Blowing Protection Committee: A committee constituted to protect whistle Blower from injustice at work place.
- “Whistle Blower” means an Employee or Outsider making a Protected Disclosure under this policy.

#### **Guiding Principles**

- Complete confidentiality of the Whistle Blower will be maintained.
- Evidence of the Protected Disclosure will not be concealed and appropriate action including disciplinary action will be taken in case of attempts to conceal or destroy evidence.
- Employee against or in relation to whom a protected disclosure has been made, will be

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Railway Site, Racking System, Refinery & Fractionation Plant : Jauharpur, Infront of G.T.I., C.B. Ganj, Bareilly (U.P.)-243502

**बढ़ रहे हैं हम, बढ़ रही हैं खुशियाँ**



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provided an opportunity of being heard.

- Anonymous or incomplete Protected Disclosure shall not be entertained.
- The decision taken by the Competent Authority to conduct an Investigation is by itself not to be construed as an accusation and is to be treated as a neutral fact finding process.
- The identity of the Whistle Blower will be kept Confidential.
- Any other Employee assisting in the said investigation or furnishing evidence shall also be protected to the same extent as the Whistle Blower.
- The competent authority shall take such other remedial action as deemed fit to remedy the improper activity mentioned in the protected disclosure and/or to prevent the reoccurrence of such improper activity.

### **Procedures**

The contact details of the Chairman of Audit Committee for addressing and sending the Protected Disclosure is as follows:

Shri Ghanshyam Khandelwal, Chairman cum Whole-time Director,  
Whistle Blower Mechanism,  
B.L. Agro Industries Limited,  
B-31, Road No.2, Parsakhera, Industrial area,  
Bareilly- 243502

The Contact details for addressing protected disclosures to the Company Secretary of Audit Committee is as follows:

Priyanka Mishra,  
Company Secretary  
Whistle Blower Mechanism,  
B.L. Agro Industries Limited  
B-31, Road No.2, Parsakhera, Industrial Area, Bareilly-243502

The Protected Disclosure/Complaint should be attached to a letter bearing the identity of

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the Whistle blower/complaint i.e. his/her Name, Employee Code and Location and should be inserted in an envelope which should be closed/secured/sealed. The envelope thus secured/sealed should be addressed to the Competent Authority and should be superscribed "Protected Disclosure". (If the envelope is not superscribed and closed/sealed/secured, it will not be possible to provide protection to the whistle blower as specified under this policy).

### **Investigation**

The investigation shall be completed normally within 45 days of the date of receipt of the protected disclosure or such extended period as the Competent Authority may permit for reasons to be recorded

All Investigators shall perform their role in an independent and unbiased manner; Investigators have a duty of fairness, objectivity, thoroughness, ethical behaviours and observance of professional standards.

On completion of investigation result will be reported to alleged person.

The Whistle Blower may also be associated with the investigations, if the case so warrants. However, he/she shall not have a right to participate.

Investigation of complain/information will be done by Audit Committee until they Forward it to any other person/Committee.

### **Protection**

No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blower.

Complete protection will, therefore, be given to Whistle Blower against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour or the like including any direct or indirect use of authority

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to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure.

The identity of the Whistle Blower shall be kept confidential.

In case a Whistle Blower feels that he/she has been victimized in employment related matters because of reporting about the violation of the Code, he/ she can submit a "Grievance" to the Whistle Blowing Protection Committee, giving specific details of nature of victimization allegedly suffered by him/her. All such grievances will be examined by the aforesaid committee. The Committee will meet at regular intervals and examine the grievances on their merits. The Committee will also conduct necessary investigation of the concern and recommend appropriate action as the case may be.

Whistle Blower can write regarding his problem in following address:

Priyanka Mishra

Company Secretary

Whistle Blowing Protection Committee

B.L. Agro Industries Limited

B-31, Road No.2, Parsakhera,

Industrial Area, Bareilly-243502

### **Notification**

All departmental heads are required to notify & communicate the existence and contents of this policy to the employees of their department. The Whistle Blower policy shall be prominently displayed on all Notice Boards of the Company, circulated to recognised unions, management staff association. This policy, including amendments thereof shall also be made available on Company's website

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