

Vigil Mechanism / Whistle Blower Policy:

Being the Company believes in high standard of professionalism, honesty, integrity & ethical behavior Company has drafted the Vigil Mechanism / Whistle Blower Policy to develop the culture for all employees to raise concerns about the fraudulent or unacceptable practice & event of Misconduct.

This Policy is issued pursuant to Section 177 of the Companies Act, 2013, read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules 2014 and of the Listing Agreement.

The Company is committed to provide adequate safeguards against victimization of employees and directors or other persons who avail of such mechanism and also provide for direct access to the Chairperson of the Audit Committee or the Director nominated by the Audit Committee, as the case may be, in exceptional cases.

- **ADDRESS OF COMMUNICATION:**

The whistle Blower shall send his/her Grievance/Concern/Complaint/ by sending mail on

Email Id: info@asianfoodproducts.in

Alternatively- Stakeholder can write a letter to following Address:

To
Compliance Officer
ASIAN FOOD PRODUCTS LIMITED
Tulsi Villa, Plot No.25, Purnawad Nagar,
Gangapur Road,
Nashik, Maharashtra 422013

Complaint under this policy will be recorded and thoroughly investigated. The Compliance Officer who will act as Vigilance Officer will carry out an investigation either himself or by involving any other Officer of the Company/ Committee constituted for the same /an outside agency before referring the matter to the Audit Committee of the Company.

The Audit Committee, if deems fit, may call for further information or particulars from the complainant and at its discretion, consider involving any other/additional Officer of the Company and/or Committee and/ or an outside agency for the purpose of investigation.

The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact finding process. The investigation shall be completed normally within 90 days of the receipt or may extendable by such period as the Audit Committee deems fit.

Any member of the Audit Committee or other officer having any conflict of interest with the matter shall disclose his/her concern /interest forthwith and shall not deal with the matter.

- **REPORTING:**

1. A quarterly report with number of Complaints received under the Policy and their outcome shall be placed before the Audit Committee and the Board periodically.
2. Details of establishment of such mechanism shall be disclosed by the company on its website, if any, and in the Board's report.

- **PROTECTION:**

1. No unfair treatment will be given to a Whistle Blower by virtue of his/her having reported a Complaint under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization of Whistle Blower. Complete protection will, be given to Whistle Blower against any unfair practice like threat or termination / suspension of service, disciplinary action, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties/functions including making further Complaint.
2. The Company will do its best to protect confidentiality of an identity of the Whistle Blower.
3. If the Whistle Blower makes an allegation in good faith, which is not confirmed by the investigation, no action will be taken against the Whistle Blower. However, if a complaint is found to be malicious or vexatious or made with any ulterior motive or malafide intention, appropriate disciplinary action will be taken.
4. The Company will not entertain anonymous / frivolous grievance.

- **COVERAGE:**

The Policy covers malpractices and events which have taken place/suspected to take place involving:

1. Abuse of authority;
2. Breach of contract;
3. Negligence causing substantial and specific danger to public health and safety;
4. Manipulation of company data/records;
5. Financial irregularities, including fraud, or suspected fraud;
6. Criminal offense;
7. Pilferation of confidential/propriety information;
8. Deliberate violation of law/regulation;
9. Wastage/misappropriation of company funds/assets;
10. Breach of employee Code of Conduct or Rules; and
11. Any other unethical, biased, favoured, imprudent event