



VENDOR AND CHANNEL PARTNER WHISTLEBLOWER POLICY

1. INTRODUCTION

At Stallion India Fluorochemicals Limited (SIFL), integrity and accountability are foundational to our business. To maintain these standards, SIFL provides a robust Whistleblower Policy that enables Vendors and Channel Partners to report actual or suspected misconduct or unethical behavior.

2. PURPOSE

The purpose of this Whistleblower Policy (the “Policy”) is to establish a formal mechanism for Vendors and Channel Partners to confidentially report concerns about illegal or unethical practices, or violations of SIFL policies, without fear of retaliation.

3. SCOPE

This Policy applies to all Vendors and Channel Partners engaged with SIFL, including their employees and subcontractors.

4. GUIDING PRINCIPLES

I. Confidentiality: SIFL is committed to protecting the identity of Whistleblowers to the fullest extent possible.

II. Anonymity: Vendors and Channel Partners may choose to remain anonymous, although providing a name and contact information is encouraged to facilitate follow-up.

III. Non-Retaliation: SIFL prohibits any retaliation against Whistleblowers and will take disciplinary action against anyone who engages in retaliation.

IV. Fair Treatment: All reports will be treated with fairness and respect for the rights of all involved parties.

V. Transparency: SIFL will communicate the policy’s mechanisms clearly to all stakeholders.

5. REPORTABLE ISSUES



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Whistleblowers may report any concerns related to:

- I. Legal and regulatory compliance violations.
- II. Financial fraud, including but not limited to embezzlement, corruption, and insider trading.
- III. Safety hazards.
- IV. Environmental damage.
- V. Conflicts of interest.
- VI. Inappropriate use of company property or information.
- VII. Breaches of confidentiality.
- VIII. Discrimination or harassment.
- IX. Any other unethical conduct.

6. REPORTING PROCEDURE

6.1 Channels of Reporting

- I. A secure online submission form.
- II. A dedicated email address: Whistleblower@SIFL.com.
- III. A confidential hotline available 24/7.
- IV. Mailing address for written reports: [Corporate Office Address].

6.2 Contents of a Report

- I. A clear description of the concern.
- II. Any evidence that the Whistleblower believes supports the reported concern.
- III. The identity of the individual(s) involved.
- IV. The time frame of the alleged misconduct.
- V. Any steps already taken by the Whistleblower, if any.
- VI. A statement of whether the Whistleblower prefers to remain anonymous.



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6.3 Receipt and Acknowledgment

-Upon submission, the Whistleblower will receive an acknowledgment of receipt within five (5) business days.

7. INVESTIGATION PROCESS

7.1 Initial Assessment

The Whistleblower Officer will conduct a preliminary review of the report within ten (10) business days to determine its credibility and whether a full investigation is warranted.

7.2 Investigation Team

An Investigation Team, which may include members from Legal, Compliance, HR, or external advisors, will be assembled to review the matter in-depth.

7.2.1 Whistle Blowing Investigation Committee (WBIC)

7.2.2 Composition and Tenure

The WBIC shall be composed of members from senior management and chaired by a member of the Audit Committee. Members will serve on the committee for a period determined by the Board.

7.2.3 Meetings

The WBIC will meet at least [quarterly/semi-annually/annually] and as required by the volume of reports received.

Minutes of the meetings will be recorded and stored securely.



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7.3 Procedure

The Investigation Team will gather evidence, interview relevant parties, and document findings. All proceedings will be conducted with the utmost discretion.

7.4 Reporting of Findings

A comprehensive report will be prepared by the Investigation Team, detailing the findings and providing recommendations for corrective action.

8. PROTECTION MEASURES

A process to ensure the Whistleblower is protected from any form of retaliation or victimization.

A support mechanism for the Whistleblower, including access to counseling or legal advice if necessary.

9. POLICY DISTRIBUTION AND COMMUNICATION

9.1 Accessibility

The Policy will be disseminated via the company's internal web portal, emails, newsletters, and physical postings at vendor and partner facilities.

9.2 Training

Periodic training programs will be conducted to familiarize all Vendors and Channel Partners with the Policy.

10. OVERSIGHT AND MONITORING

The Compliance Officer will monitor the effectiveness of the Policy and propose updates or improvements.



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The Audit Committee will receive and review periodic reports on the handling of Whistleblower reports.

11. RECORDS MANAGEMENT

Detailed records of all reports, investigations, and outcomes will be maintained securely and confidentially for a minimum of seven (7) years.

12. AMENDMENTS AND REVISIONS

-The Policy may be amended or revised periodically to reflect changes in law, industry standards, or SIFL policies.

13. CONTACT INFORMATION

- **Whistleblower Officer

** : [Full Contact Details]

- **Anonymous Hotline** : [Number]

- **Online Portal** : [URL]

- **Postal Address** : [Corporate Address]

14. POLICY REVIEW AND RATIFICATION

- This Policy will be reviewed annually or as needed by the Audit Committee and approved by the Board of Directors.

15. DECLARATION



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- This document is approved by the Board of Directors and is effective as of [Effective Date].