



Whistle Blower

&

Vigil Mechanism

Policy

Beaufond Plc



WHISTLE BLOWER

& VIGIL MECHANISM POLICY

Preface:

Beaufond Plc and its subsidiary (collectively the "Company") are committed to complying with the foreign and domestic laws that apply to them, satisfying the Company's Code of Conduct (Ethics) and particularly to assuring that business is conducted with integrity and that the Company's financial information is accurate.

If potential violations of Company policies or applicable laws are not recognized and addressed promptly, the Company and those working for or with the Company could face governmental investigation, prosecution, fines, other penalties and heavy losses. That can be costly.

Consequentially, and to promote the highest ethical standards, the Company will maintain a workplace that facilitates the reporting of potential violations of Company policies and applicable laws.

Employees must be able to raise concerns regarding such potential violations easily and free of any fear of retaliation. That is the purpose of this policy - "**Beaufond Plc Whistle-blower Policy (BWP)**"..

This Policy was first adopted in the year 2009, and reviewed year after year. Beaufond Plc has a duty to observe the highest standards of conduct and integrity, and to uphold the good standing and reputation of the company. It refrains from any conduct which might discredit the interest of the company.

With its commitment to upholding the values and behaviour outlined in the Company's "Code of Ethics" including complying with all applicable laws and practices, in the month of October 2018, a group of committee headed by Chief Risk & Compliances as Chairman with Audit & Legal and General Manager Operation as members was formed to update and formulate a revised BWP. The team has submitted their report to the Board and the Board on its meeting on 24th April 2019 has approved the "**Beaufond Plc Whistle-blower Policy (BWP)**" and implemented with immediate effect.

We congratulate the team and the staff for their whole hearted contribution towards this task and also mark its appreciation in the Board meeting. All Board members, executives, officers, professional and staff are advised to exercise this Policy with true spirit

Regards,

Dated: 24.04.2019

Director & CEO



WHISTLE BLOWER AND VIGIL MECHANISM POLICY

I	Purpose, Application & Definition	4
II	Reporting System	5
III	Confidentiality, Protection and Investigations	6
IV	Retaliations – Not Tolerated	7
V	Documents & Penalties	8
VI	Grievance Policy	9
	Appendix – I - Provisions of the Company's Act	10



I.

Purpose, Application & Definition
Of
Whistle Blower & Vigil Mechanism

Purpose:

The purpose of this Policy is to encourage the reporting, as required under our Code of Conduct / Ethics of any suspected of fraud or corrupt conduct or any other form of inappropriate behaviour (reportable conduct). While this would generally be through the normal channels of line management, there may be times where an employee or manufacturing contractor believes it is inappropriate or difficult for matters to be reported through these channels. In these cases it is important that employees or contractors have another avenue through which to express their concerns in order to protect their identity.

Application

The protection of this Policy applies to all full time and part time staff and to manufacturing contractors. In respect of reports relating to specific breaches of land law and the international applicable, a whistle-blower will have legal protection. Details of this specific protection are in **Appendix 1.**

Definition of Whistleblower

A director, executive, officer, manager, professional, employee or manufacturing contractor of the Company who wishes to report conduct they believe is in breach of our 'Code of Conduct / Ethics' or in breach of the law of the land or the international law and where the individual perceives a need to avail themselves of protection against reprisal for having made the report. A whistle blower may or may not elect to remain anonymous.



II. Reporting System

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 / Ethics. It is important that you report all suspected violations. This includes possible accounting or financial reporting violations, insider trading, leak of unpublished price sensitive information, bribery, or violations of the anti-retaliation aspects of this Policy. Consult the Company's Code of Conduct and Ethics for a more detailed description of potential violations and other areas of particular concern. Retaliation includes adverse actions, harassment, or discrimination in your employment relating to your reporting of a suspected violation.

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 deterrence of violations of Company policies or applicable laws. You should not fear any negative consequences for reporting reasonably suspected violations because retaliation for reporting suspected violations is strictly prohibited by Company policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.

What, Who & How to Report

Any suspected fraud, corrupt conduct, inappropriate behaviour or illegal activity involving the Company or its employees in any way. These concerns must have some reasonable foundation for being raised.

The Chief Risk, Legal & Compliance (CRL&C) is the person to whom matters should be reported in the first instance. If the individual feels uncomfortable reporting the matter to the CRL&C in person, a number ways that may be contacted directly by phone, letter or e-mail in the utmost confidence.

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. Where you have not reported anonymously, you may be contacted for further information.



III. Confidentiality, Protection and Investigations:

In addition to our legal obligations, the Company extends its assurance of confidentiality to all other matters. All information received in respect of other reportable conduct will be held in strictest confidence and, where clearly desired by the individual, the identity of the person will not be disclosed without permission.

The Company is committed to ensuring that any individual is not disadvantaged in any way from validly raising concerns about suspected reportable behaviour. In particular, such a person will not be disadvantaged by dismissal, demotion, harassment, discrimination or bias.

If the whistle blower feels that reprisals have been taken, the individual can appeal through the Risk Committees of the Beaufond Plc.

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 cooperate in the investigation of reports of violations. Failure to cooperate 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.

The investigating officer will ensure that all reports are investigated promptly and appropriately. In this regard the officer will assume no guilt on the part of any party until proven otherwise. Where any wrongdoing is uncovered, the officer will apply the guidelines of the Code of Conduct (Ethics).

If there are concerns as to the safety of the whistle-blower, he or she may request leave of absence or a temporary change of workplace. Such requests will be given appropriate consideration.



IV. 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 participating in the investigation of a reasonably suspected violation will result 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 employee may also be subject to civil, criminal and administrative penalties.



V. Documents & Penalties

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

Where any Officer, employee or manufacturing contractor of Beaufond Plc breaches this policy, this will be considered a breach of the Code of Conduct and dealt with as such.



VI. Grievance Policy

If you have a reportable grievance under the Working Together Policy or the Grievance Policy, then you should report the grievance under the terms of those policies.

Beaufond Plc is unable to offer you anonymity in relation to such grievances because, for procedural fairness, the person who you report must be given an opportunity to present his or her version of the circumstances.

You are protected by the Policy if you are a witness to an incident and you report your concerns to management.



APPENDIX I – PROVISIONS OF THE COMPANY'S ACT

The Companies Act provides protection to a whistle-blower if they report a contravention or suspected contravention of the "Companies legislation to the respective country" law and the Securities and Investments Commission if any, the Company's auditor, a Director or other authorized person nominated then and there where:

They have reasonable grounds to suspect the disclosure indicates a contravention of the Corporations legislation;

The disclosure is made in good faith; and

Before making the disclosure, the individual provides their name to the person to whom they are disclosing the information.

Without the individual's consent, the person to whom the information is disclosed, cannot under law, disclose the information, or the individual's identity to any other person in the Company.