



VIGIL MECHANISM /WHISTLE BLOWER POLICY

INTRODUCTION

Section 177 of the Companies Act, 2013 requires every listed company and such class or classes of companies, as may be prescribed to establish a vigil mechanism for the directors and employees to report genuine concerns in such manner as may be prescribed.

DEFINITIONS

“Protected Disclosure” means a written communication of a concern made in good faith, which discloses or demonstrates information that may evidence an unethical or improper activity.

“Vigilance Officer” is a person or Committee of persons, nominated/appointed to receive protected disclosures from whistle blowers, maintaining records thereof, placing the same before the Audit Committee for its disposal and informing the Whistle Blower the result thereof.

“Subject” means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

OBJECTIVE

The Vigil (Whistle Blower) Mechanism aims to provide a channel to the Directors and employees to report genuine concerns about unethical behaviour, actual or suspected fraud or violation of the Codes of Conduct or policy. The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations and in order to maintain these standards, the Company encourages its employees who have genuine concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

SCOPE

The Policy is an extension of the Code of Conduct for Directors & Senior Management Personnel and covers disclosure of any unethical acts, malpractices and events which have taken place/ suspected to take place involving:

1. Breach of the Company's Code of Conduct.
2. Breach of Business Integrity and Ethics.
3. Breach of terms and conditions of employment and rules thereof.
4. Intentional Financial irregularities, including fraud, or suspected fraud.
5. Deliberate violation of laws/ regulations.
6. Gross or willful negligence causing substantial and specific danger to health, safety and environment.
7. Manipulation of company data/ records.
8. Pilferation of confidential information.
9. Gross Wastage/ misappropriation of Company funds/ assets.

The policy stipulates provisions for its' effective implementation as follows:

- Anonymous complaint will not be entertained.
- Identity of the complainant will be protected and will be known only to the Enforcement committee.
- No unfair treatment will be meted to the 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.

All Protected Disclosures should be addressed to the Vigilance Officer of the Company or to the Chairman of the Audit Committee in exceptional cases.

The contact details of the Vigilance Officer are as under: -

Name and Address - Mr. Jayant Jogaikar

Vice President

Godavari Drugs Limited

A 6/2, M.I.D.C.,

Nanded - 431603

Email: jvjogaikar@godavaridrugs.com

COMMUNICATION

Directors and Employees shall be informed of the Policy by publishing on the notice board and the website of the Company.

AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Directors and employees unless the same is not communicated in the manner described as above of conduct.