



CACHET PHARMACEUTICALS PVT. LTD.

415, Shah Nahar, Dr. E. Moses Road, Worli, Mumbai - 400018, INDIA.

Tel.: 91-22-2497 0011 / 4082 9999. Fax: 91-22-2497 3691 • Website: www.cachetindia.com

The Whistleblower Policy

Policy Title : Whistleblower Policy	Policy No	36
Applies To: All employees of the organization and associate members.	Effective Date	1 st June 2022
	Supersedes	Nil

1. Objective

- a. Cachet's Whistleblower policy encourages and protects employees who speak up when they encounter behavior in the workplace that is unethical, illegal or goes against the values of our organization.
- b. The company is committed for doing business in ethical ways and therefore an employee should raise their concern if they come across any behavior, activity which is suspected to be unethical and dangerous for the company.

2. Applicability

The said policy is applicable to all current and former, permanent, temporary, or contracted staff and volunteers. All partners, company secretaries, suppliers (or their employee or subcontractor) and volunteers. It also applies to relatives, dependents, or spouses of any of these people.

3. Purpose and Objectives

- a. The main purpose of the policy is to detect corrupt, illegal, or other undesirable conduct. It provides a platform to voice genuine concerns or grievances about unprofessional conduct.



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- b. We strongly encourage you to speak up if you suspect or witness any matters of concern. All reports made under this policy will be taken seriously. This will help us in realigning various processes and take corrective actions as part of good governance practice.

- c. This Policy describes the protections available to whistle-blowers, what matters are reportable, how you can report your concerns without fear of Detriment, and how the organization will support and protect you.

4. Who is a Whistleblower?

You're a whistleblower if you're an employee of our organization and you report certain types of wrongdoing seen at workplace. A whistleblower is one, who reveals information about evidence of an unethical activity within the organization that is deemed illegal, immoral, illicit, unsafe, or fraudulent.

5. Protection towards whistleblower.

- a. We affirm that we shall not allow any whistleblower to be victimized for making any complaint. We condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against the whistleblowers.

- b. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner within the organization.



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6. Reporting in good faith

- a. It is recommended that any individual who wishes to report, shall do so after gathering adequate facts/data to substantiate the complaint and not complain merely on rumor.
- b. This also means that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.
- c. However, if a complaint, after an investigation proves to be frivolous, malicious, or made with an ulterior intent, the organization shall take appropriate disciplinary or legal action against the concerned whistleblower.

7. Examples of Reportable Conduct include, but are not limited to:

- a. Theft, threatening, violence, damage against property.
- b. Fraud, money laundering or misappropriation of funds.
- c. Offering or accepting a bribe.
- d. Financial irregularities.
- e. Failure to comply with, or breach of, legal or regulatory requirements.

8. Procedure for raising a complaint

- a. You may raise your concern in writing at whistleblower@cachetindia.com. You will need to provide the following information:
 1. The nature of your concern and why you believe it to be true
 2. The background and history of the concern (giving relevant data)



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- b. You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.
- c. Secondly, you may approach your immediate line manager, if it is pertaining to your immediate line manager you can approach the HR Department in that case.
- d. Based on the severity of the issue the Investigation & Scrutiny committee along with Management shall take appropriate action as deemed fit.

9. Amendments

The policy and procedure mentioned in this document are subject to review from time to time, and the benefit may be unilaterally withdrawn or amended in any way whatsoever, by the Company.

Cachet Pharma reserves the right to amend, suspend or terminate this policy at any time and for any reason with or without notice in accordance with applicable law.

Approved by

A handwritten signature in blue ink, appearing to read "S.K. Singh", is written over a dotted line.

(Signature & Date)

S.K Singh
MANAGING DIRECTOR