


Human Resource Policy (Ref. SOP No.: SOP/HR/005)	 Molbio Diagnostics Private Limited		
Whistleblower Policy	Policy code	:	MD/P44
	CC No.	:	CC24/I/HR/227
	Version. No.	:	01
	Effective Date	:	

1. Introduction:

Molbio Diagnostics Private Limited ("Molbio") is committed to conducting its business with integrity and maintaining the highest ethical standards. The Whistleblower Policy has been established to provide a framework for employees and stakeholders to report any unethical, illegal, or improper activities they observe within the company, without fear of retaliation.

2. Purpose:

This policy is designed to ensure that concerns regarding wrongdoing, malpractice, or unethical behavior within Molbio can be reported freely and without fear of victimization, discrimination, or dismissal. It provides a confidential mechanism for employees and other stakeholders to raise their concerns, ensuring transparency and accountability.

3. Scope:

This Policy is applicable to all employees of Molbio Diagnostics Private Limited, including Apprentice Trainees, contractual employees, suppliers and other stakeholders. The role of a whistleblower is to report concerns, not to investigate them. Although whistleblowers are not expected to prove their allegations, they must provide sufficient grounds for concern.

The formation of the Whistleblower Committee, as referenced in this policy, will follow the procedures outlined in SOP no: SOP/HR/012

4. Disqualification


Whistleblowers who knowingly make false allegations will face disciplinary action. Any whistleblower who submits false complaints three times will be disqualified from further disclosures under this policy. False reporting undermines the effectiveness of the whistleblowing system and will not be tolerated.

5. Reporting Procedure:

Whistleblowers can submit their concerns in writing (English or Hindi) to the Whistleblower Committee. There is no specific format for the disclosure, but it should include the following details:

- Name, address, and contact information of the whistleblower (optional if anonymity is preferred).
- A description of the malpractice, including names of those involved and specific details like time and place of occurrence.
- Complaints can be submitted via email to **whistleblower@molbiodiagnostics.com**, or by sending a sealed, confidential letter to the address below:

Molbio Diagnostic Private Limited
Phase II D, Plot No. L - 46,
Verna Industrial Estate,
Verna Goa. 403722

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Upon receipt of the complaint, the Management will appoint the investigators. The investigation process will follow these steps:

1. Investigators will determine whether the complaint falls under the scope of this policy.
2. If identity is disclosed, investigators will ensure confidentiality is maintained.
3. Investigators will gather evidence from relevant parties.
4. All aspects of the investigation will remain confidential to preserve the integrity of the process.
5. Findings will be reported to the Board of Directors, and appropriate actions will be taken

Reportable Matters:


Reportable concerns include, but are not limited to:

- Breach of contract
- Misuse of Authority or assets
- Misrepresentation of company data or financial record
- Negligence impacting public health and safety
- Sharing of confidential information
- Non compliance with the company authority.
- Non compliance with the code of conduct.
- Disclosing confidential information with outsiders ex. competitors
- Bribery or other unethical practices

6. Role and Responsibilities:

Following the regulations guided by the Whistleblowing policy at work the roles and responsibilities of employees, stakeholders, Investigators and Management are explained as follows:

- a) **Employees** are responsible for reporting any serious unethical or illegal activities. They should provide supporting evidence when raising a concern. If dissatisfied with the investigation, they may escalate the matter to the Board of Directors.
- b) **Investigators** are tasked with collecting evidence, maintaining confidentiality, and preparing a report with findings. They will submit their report to the Head of HR and Management for further action.
- c) **Head HR** ensures the whistleblower policy is properly implemented and oversees the investigation process. They will determine whether wrongdoing has occurred and ensure that disciplinary or preventive measures are enacted.
- d) **Management** is responsible for fully cooperating with investigations, maintaining confidentiality, and taking the necessary actions based on the investigation's outcome.

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7. Protection Against Retaliation:

Molbio ensures that no retaliatory actions will be taken against any whistleblower who raises a concern in good faith. The company is committed to protecting employees who come forward with concerns about illegal or unethical conduct.

8. Retention of documents:

All complaints, investigation reports, and related documents must be retained for a period of five (5) years. Investigators are responsible for maintaining these documents for compliance and reporting purposes.

9. Amendments to the Policy:

Any amendments or exceptions to this policy must be pre-approved by the Management.

10. Exceptions to the Policy

Any exception to the principles mentioned in this policy must be pre-approved by Management.

11. Effectivity

This policy shall be effective immediately and shall be made known to each employee.

Signature:

Prepared By

Name:

Ghoshali Mangueshkar

Designation:

SA. Executive -
H.R. and Administration

Approved By

Dushyant Bhargava
SA. H.R. Mangeshkar -
H.R. and Administration

Authorized By

Gangeetha Guhani
Director - Operations