

Ganon Trading and Finance Co. Limited
Unit No. 1207, B Wing, One BKC, Plot No. C 66, Bandra Kurla Complex, Bandra East,
Mumbai 400 051.
CIN: L51900MH1985PLC036708OBJECTIVE

Whistle Blower Policy

The objective of this policy is to provide Associates (whether permanent or on contract), Investors, customers, vendors and other stakeholders (hereinafter collectively referred to as stakeholders) an avenue to raise concerns, in line with the commitment of Ganon Trading and Finance Limited to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication. To provide necessary safeguards for protection of employees from reprisals or victimization, for whistle blowing in good faith.

Ganon Trading and Finance Co. Limited encourages all its stakeholders to communicate and raise any behavior or practice, they may be aware of and suspect to be unethical, illegal or otherwise inappropriate and harmful to the company. Ganon Trading & Finance Co. Limited Whistleblower Policy is a critical means through which Stakeholders can raise actual or suspected violations. The policy sets out ways through which the stakeholders can raise concerns that relate to actual or suspected violations of the Code of Ethical Business Conduct, Accounting, Internal Accounting Controls, Auditing Matters and applicable national and international laws including statutory / regulatory rules and regulations which includes but not limited to Companies Act and SEBI.

SCOPE

The policy is applicable to all Investors, Associates (including permanent and on contract) customers and Suppliers / Vendors of Ganon Trading and Finance Co. Limited.

WHISTLEBLOWER COMPLAINTS

A "whistleblower complaint" is a complaint where a Complainant/ Whistle Blower (person raising the Complaint) believes that Ganon Trading and Finance Co. Limited (or an officer or Associate of Ganon Trading and Finance Co. Limited) has, or may have, breached the Code of Ethical Business Conduct, Accounting, Internal Accounting Controls, Auditing Matters and applicable national and international laws including statutory / regulatory rules and regulations.

Alerting Ganon Trading and Finance Co. Limited to potential issues will assist in promoting compliant corporate environment and will protect Ganon Trading and Finance Co. Limited reputation. All the stakeholders have an obligation to raise such concerns as soon as possible. All the stakeholders shall address the complaints/concerns to the CORPORATE OMBUDSMAN. In case of a complaint/concern against CORPORATE OMBUDSMAN, the same shall be addressed to the Chairman of the Board of Directors.

PROTECTION AFFORDED TO A WHISTLE BLOWER

Ganon Trading and Finance Co. Limited prohibits and discourages the retribution against anyone for raising or for helping to address integrity concerns. Associates shall not be disadvantaged in any manner for having raised a concern. Allegations of retaliation will be investigated and if

proved, appropriate action will be taken. Associates can raise allegations of retaliation with HR or with CORPORATE OMBUDSMAN.

WHISTLE BLOWER PROCESS

1. A Whistle Blower can raise a concern with the CORPORATE OMBUDSMAN by
 - a. Sending an e-mail to ganontrading@gmail.com.
 - b. In person - Complaints can also be reported verbally on telephone no. 022-61340914. Verbal reports will normally be documented by the CORPORATE OMBUDSMAN by a written transcription of the verbal report.
2. All whistleblower complaints received shall be reviewed by the CORPORATE OMBUDSMAN. The CORPORATE OMBUDSMAN shall assess whether or not the issue raised constitutes a whistleblower complaint. The CORPORATE OMBUDSMAN will respond to the concern within 48 hours of receiving it.
3. The Whistle Blower may disclose his/her identity and Ganon Trading and Finance Co. Limited would provide protection against retaliation.

Note: It is the discretion of the Whistle Blower to conclude whether or not the issue shall be raised anonymously. For the matter to be aptly investigated, the Whistle Blower may choose to disclose his/her identity along with the details of the complaint. While the anonymous complaints will also be suitably and sincerely looked into, it will provide more leverage and will be pertinent to investigate the complaint sufficiently if the Whistle Blower chooses to disclose his /her identity. The identity of the whistleblower shall be kept confidential to the maximum reasonable extent. Malicious Allegations: Malicious and baseless allegations by Associates or other stakeholders may result in disciplinary action and could include even termination and / or other appropriate action, as the case may be.

4. Once the assessment is made by the CORPORATE OMBUDSMAN, he will:
 - Contact the Associate/Customer/Vendor to obtain the information necessary to conduct an effective investigation;
 - Discuss the steps to be taken to investigate the issue.

Note: Whistle Blowers involved in an investigation are also expected to keep all discussions confidential. This is important to safeguard the integrity of the investigation and the whistleblower process generally.

The CORPORATE OMBUDSMAN needs to ensure that all investigation is carried out objectively.

5. The CORPORATE OMBUDSMAN and the designated officer will provide feedback to the Whistle Blower on the progress of the investigation.
6. The CORPORATE OMBUDSMAN shall submit a report of all the complaints received during a quarter to the Board of directors in the first Board meeting held in the following quarter or such other Board meeting at the direction of the Board. The report shall contain details of all

the complaints, their status and such other information as CORPORATE OMBUDSMAN deems fit or necessary.

CORPORATE OMBUDSMAN

The CORPORATE OMBUDSMAN is primarily responsible for overseeing and managing compliance issues within the organization. The CORPORATE OMBUDSMAN is in charge of ensuring, that the company and its Associates are complying with internal policies and procedures.

Please refer Annexure A for the contact details of CORPORATE OMBUDSMAN.

INVESTIGATION PROCEDURE

Concerns about Integrity and non-compliance with Ganon Trading & Finance Co. Limited Code of Ethical Business Conduct will be investigated as per process laid down and defined by the CORPORATE OMBUDSMAN.

The Associate/s concerned who is/are found to be non-compliant after the investigation, are liable to face appropriate disciplinary action including termination from the services of the company. Ganon Trading and Finance Co. Limited process includes.

- Stakeholders need to write to CORPORATE OMBUDSMAN immediately and raise a concern with required evidences and documents.
- He will investigate into the matter within 48 hours of receipt of the whistle blower complaint.
- The CORPORATE OMBUDSMAN shall conduct an inquiry and come up with a report within 15 to 45 working days from the date of the initial complaint.
- The CORPORATE OMBUDSMAN should recommend the corrective actions to the appropriate managers for implementation. In the event the accused is found guilty, penalties will be prescribed through CORPORATE OMBUDSMAN, and will be implemented by HR.
- The person raising the concern will also receive an update on the final outcome.

RETENTION OF DOCUMENTS

All Complaints received in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of seven years.

AMENDMENT

The Board of directors of the company reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.

NOTIFICATION

The new Associates shall be informed about the policy by HR via the new joiner induction. This policy as amended from time to time shall be posted on the website of the company.

ANNUAL AFFIRMATION

The company shall annually affirm that it has not denied any personal access to the Audit Committee and that it has provided protection to whistle blower from adverse personal action, wherever applicable. The affirmation shall form part of Corporate Governance report as attached to the Annual Report of the company. Please refer Annexure A for the contact details of chairperson of the Audit Committee.

ROLES AND RESPONSIBILITIES

STAKEHOLDERS:

1. Bring to attention of the company, any improper practice they may be aware of at the earliest. Although they are not required to provide proof, they must have sufficient cause for concern.
2. Co-operate with investigating authorities, while maintaining full confidentiality.
3. The intent of the policy is to bring genuine and serious issues to the forefront and it is not intended for petty complaints. Malicious allegations by Associates can result to disciplinary action.
4. A whistle blower has the right to protection from retaliation. But this does not extend to immunity for complicity in the matters that are the subject of the allegations and investigation.
5. In the event of exceptional cases, where the whistle blower is not satisfied with the outcome of the investigation carried out by the CORPORATE OMBUDSMAN, he / she can make a direct appeal to the Chairman of the Audit Committee of Ganon Trading & Finance Co. Limited.

CORPORATE OMBUDSMAN:

1. Ensure that the policy is being implemented.
2. Ascertain prima facie the credibility of the charge. If initial enquiry indicates further investigation is not required, close the issue.
3. Document the initial enquiry.
4. Provide quarterly reports to the Board of directors.
5. Acknowledge receipt of concern to the complainant, thanking him/her for initiative taken in upholding the company's business conduct standards.
6. Ensure that necessary safeguards are provided to the complainant.

CONTACT DETAILS

CORPORATE OMBUDSMAN:

Name	Jay Nareshbhai Sanghvi
Address	Unit No. 1207, One BKC, Plot No. C - 66, Bandra Kurla Complex, Bandra East, Mumbai 400 051
Phone	022 - 61340914
Email Id	ganontrading@gmail.com