

Gemini Edibles & Fats India Limited

Regd. Office: Freedom House, 8-2-334/70&71, (Opp: SBI Executive Enclave),
Road No.5, Banjara Hills, Hyderabad-500 034,
Telangana State, India.
Ph. No. 040-67357888
CIN: U15205TG2008PLC058708

VIGIL MECHANISM POLICY

Introduction

As per Section 177 (9) of the Companies Act, 2013 ("Act") and Regulation 4(2)(d)(iv) and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Every company which falls under anyone of the following categories, shall have vigil mechanism policy duly adopted by Board of Directors. Gemini Edibles & Fats India Limited (**the "Company"**) falls under **Clause 1(b) of section 177(9) i.e. the companies which have borrowed money from banks and public financial institutions in excess of fifty crore rupees, as such it is required to adopt the policy namely "Vigil Mechanism Policy" ("the Policy").**

The "**Audit Committee**" or **Committee** of the company shall oversee the Vigil Mechanism process through Vigilance Officer to whom Directors and employees may address their concerns.

The Company has formulated the Policy to provide adequate safeguards against victimization of employees and Directors who can avail the Vigil Mechanism.

The Policy was approved by the board of directors of the Company in its meeting held on July 23, 2021.

Policy

The company encourages best practices and ethical working environment and in the process of achieving this objective, if any employee or any director comes across with any unethical and improper events or malpractices which may have taken place/suspected to take place in carrying out normal business transactions by the company, then he/she can make a protected disclosure in writing to the vigilance officer nominated by the Committee.

Vigilance Officer

Company Secretary of the company shall be the Vigilance Officer and all Protected Disclosures should be reported in writing by the complainant as soon as possible, but not later than 30 days after he/she becomes aware of the same and should either be typed or written in a legible handwriting in English and sent either as scanned attachment or an email to the email id provided below: vigilanceofficer@gefindia.net

Investigation

All Protected Disclosures under the policy will be recorded and investigated. The Vigilance

Officer will carry out an investigation either himself/herself or by involving any other officer of the Company/committee constituted for the same /an outside agency before referring the matter to the Committee. Apart from investigation work, Vigilance Officer may also involve any other officer of the company for overseeing the Vigil Mechanism.

Protection

Adequate safeguards against victimisation of Complainants shall be provided. The identity of the complainant shall be kept confidential to the extent possible and permitted under law. Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower

By Order of the Board
For Gemini Edibles & Fats India Limited



Pradeep Kumar Chowdhry
Managing Director
DIN: 01154121

Place: Hyderabad
Date: July 23, 2021