



KINGFA SCIENCE & TECHNOLOGY (INDIA) LIMITED

Whistleblower Policy and Vigil Mechanism

KINGFA SCIENCE & TECHNOLOGY (INDIA) LIMITED (KINGFA) has been committed to conduct its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour in accordance with applicable laws.

KINGFA is committed to developing a culture where it is safe for all stakeholders including directors and employees to raise concerns/alarm on issues involving malpractices, violation of law, abuse of power, financial irregularities, etc.

The Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 require each listed company to establish a Vigil Mechanism for directors and employees to report genuine concerns or grievances about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct. SEBI (Prohibition of Insider Trading) (Amendments) Regulations, 2018 also requires every listed company to formulate a Whistle Blower policy.

The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects all stakeholders including directors and employees wishing to raise a concern about serious irregularities within the Company from being victimized/ harassed, including by the superiors as also prohibition of leak of unpublished price sensitive information.

In compliance with the aforesaid Act and Regulations, KINGFA has framed a Policy with the object of providing a mechanism for stakeholders of KINGFA to report their genuine concerns regarding violations of any legal or regulatory requirements of the applicable laws / clauses of Code of Conduct of the Company. The Executive Director of the Company shall be the person to whom any such reports can be made and in exceptional cases, the Chairman of the Audit Committee can be directly accessed.

This Policy provides an avenue to various stakeholders of KINGFA viz. Directors, Employees, Suppliers, Contractors and Customers of the Company to point out concerns of any violation of legal or regulatory requirements, incorrect or misrepresentation of any financial statement, reports, disclosures etc. It is not necessary for the whistleblower to prove the veracity of an allegation but he needs to establish that there are adequate grounds for concern. Sufficient safeguards have been provided to ensure that the complainant is not harassed or victimized. Identity of the complainant will be protected and this is subject to legal constraints. This Policy has also been framed to report any instances of leak of unpublished price sensitive information as per the SEBI (Prohibition of Insider Trading) Regulations.

Complaints under this Policy from all the stakeholders except Directors of the Company may be addressed to Mr.D.Balaji, Executive Director of KINGFA for the purpose of receiving the complaints and ensuring appropriate action. His contact details are: Mobile No. : 9840295002 and E-mail id: dbalaji@kingfaindia.com. His contact address: Executive Director, Kingfa Science & Technology (India) Limited, Plot No : F 5/5, Chakan Industrial Area, Phase-2, MIDC, Vasuli - Shinde, Tal Khed, Pune - 410501.

In case of complaints by directors, the complaint may be addressed to the Chairman of the Audit Committee of the Board of Directors. Chairman of the Audit Committee of KINGFA shall submit a report to the Board of Directors of the Company on a regular basis about complaints referred to him.

Complainants should mention their names as follow up action may not be possible unless the source of information is identified. Concerns expressed anonymously will not be investigated. Malicious allegation by employees will lead to disciplinary action.

KINGFA reserves its right to amend or modify this Policy at any time without assigning any reason whatsoever.
